

4822 - 484

05/04/2000

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 04 2000

S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: BD1
EPA Registration No. 4822-484
Amendment Date: 03/30/00
EPA Receive Date: 05/05/00

Attention: Ms. Christine Benter,
Registration Specialist

The amendment referenced above, submitted in connection with registration under FIFRA, as amended, is acceptable provided that the following recommendations are addressed prior to the release of the product for shipment.

1. The Agency feels that the use of so many qualifiers on this label will be confusing to consumers. Therefore, you will need to delete the double asterisk/dagger phrases, "***On hard, inanimate, environmental surfaces," and "+ On hard, inanimate, environmental bathroom surfaces between cleanings."
 - a. You do not need to qualify the mold and mildew claims with the double asterisk phrase, "On hard, inanimate, environmental surfaces". However, you will need to include this phrase in the mold/mildew and disinfection directions.
 - b. Based on the submitted efficacy data to support the 14 day antibacterial residual claims, this product is only effective on bathroom surfaces. You will need to include the double dagger phrase, "on hard, inanimate, environmental bathroom surfaces between cleanings," with the claims your were trying to qualify otherwise the claims are false and misleading. The claims should be revised to reflect the following:

(Kills)(Eliminates) mold and prevents it from regrowing on hard, inanimate, environmental bathroom surfaces between cleanings for 14 days.

CONCURRENCES							
SYMBOL	7510						
SURNAME	Campbell						
DATE	5/7/00						

(Kills)(Eliminates) mildew and prevents it from regrowing *on hard, inanimate, environmental bathroom surfaces between cleanings* for 14 days.

(Kills)(Eliminates) mold and mildew and prevents it from regrowing *on hard, inanimate, environmental bathroom surfaces between cleanings* for 14 days.

Prevents (re-growth) (return) of mold *on hard, inanimate, environmental bathroom surfaces between cleanings* for 14 days.

Prevents (re-growth) (return) of mildew *on hard, inanimate, environmental bathroom surfaces between cleanings* for 14 days.

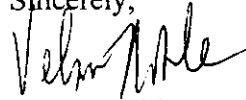
Prevents (re-growth) (return) of mold and mildew *on hard, inanimate, environmental bathroom surfaces between cleanings* for 14 days.

2. Based on the submitted efficacy data to support the 14 day antibacterial residual claims, this product is only effective on bathroom surfaces. The phrase, "on hard, inanimate bathroom surfaces between cleanings," must be deleted from the first qualifier (dagger). You must include the site where this product is effective in the claims otherwise the claims are false and misleading.
 - a. Revise the claim, "14 day antibacterial activity," to state "14 day antibacterial activity † *on many hard, inanimate bathroom surfaces between cleanings*."
 - b. Revise the claim, "Residual self-sanitizing for 14 days against many bacteria" to state "Residual self-sanitizing for 14 days against many bacteria † *on many hard, inanimate bathroom surfaces between cleanings*."
 - c. Revise the claim, "BD1 stops many bacteria from coming back in 14 days," to state "BD1 many bacteria † from coming back in 14 days *on many hard, inanimate bathroom surfaces between cleanings*."
2. On page 3, the surfaces, window sills and kitchen sills, must be qualified as hard, non-porous by stating "*finished*" window and kitchen sills. Also, you will need to delete household and kitchen areas from the list of surfaces to clean and/or disinfect because they are not considered surfaces.
3. This product is not cleared as a food contact sanitizer. Therefore, you will need to state that the "*exteriors*" of the kitchen appliances, refrigerators, and stoves are to be cleaned and/or disinfected.
4. Under the residual directions, you will need to list the specific surfaces in the bathroom that this product may be used to obtain the 14 day activity. Also, you will need to state that the product must be reapplied after completing the cleaning step. The directions should reflect the following:

- a. For Residual Mold and Mildew Control: First clean the surface according to "TO CLEAN" directions. **Then spray surfaces thoroughly.** Reapply at least every two weeks or as surfaces become heavily soiled. For best residual results, start using on surfaces that are free of visible mold and mildew stains. This product is residually effective on hard, inanimate bathroom surfaces between cleanings for 14 days.
- b. For Residual Antibacterial Control: First clean the surface according to "TO CLEAN" directions. Then spray surfaces thoroughly. Leave for at least a minute before wiping. **Reapply at least every two weeks or as surfaces become heavily soiled.** This product is residually effective on hard, inanimate bathroom surfaces between cleanings for 14 days.

A stamped copy of label is enclosed for your records. Please submit one copy of the final printed label before you release this product for shipment. If you have any questions regarding this letter, please contact Jacqueline Campbell at (703) 308-6416.

Sincerely,



Velma Noble

Product Manager (31)

Regulatory Management Branch I

Antimicrobials Division (7510C)

Proposed label as of March 29, 2000

BDI
S.C. Johnson (A Family Company)

Disinfectant (Antibacterial) (Kitchen) (Basin, Tub & Tile) (Bathroom) (Household) Cleaner
Multi-purpose Disinfectant (Antibacterial) Cleaner

NEW

(Unscented) (Country Garden) (Original Scent) (RainShower Fresh) (Mountain Breeze) (Spring Fresh) (Lemon)
(Pine) (Citrus)

ACTIVE INGREDIENTS

n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethyl benzyl ammonium chloride.....	0.11%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chloride.....	0.11%
S-(trimethoxysilyl) propyldimethyloctadecyl ammonium chloride.....	0.11%

INERT INGREDIENTS 99.67%

KEEP OUT OF REACH OF CHILDREN
CAUTION: See additional precautionary statements on back label

Net Contents:

Cleaning claims:

BDI cleans most (kitchen) (bathroom) (and) (household) surfaces.

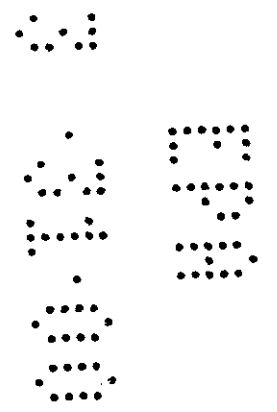
Non-public health claims:

(Reduces) (Controls) the growth of odor causing bacteria (on (kitchen) (bathroom)(and) (household) surfaces).
(Reduces) (Controls) the growth of odor causing bacteria (on (kitchen) (bathroom)(and) (household) surfaces) for 14 days.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAY - 4 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 4822-484



Disinjecting Antibacterial/Mold & Mildew Control claims:

- (Reduces) (Controls) (Eliminates) (Kills) many household germs* (on (kitchen) (bathroom)(and) (household) surfaces).
- (Reduces) (Controls) (Eliminates) (Kills) many bacteria* (on (kitchen) (bathroom)(and) (household) surfaces).
- BD1 stops many household germs* (on (kitchen) (bathroom)(and) (household) surfaces).
- BD1 stops many bacteria* (on (kitchen) (bathroom)(and) (household) surfaces).
- Gives treated surfaces effective protection against many household germs*.
- Gives treated surfaces effective protection against many bacteria*.
- Gives treated surfaces effective protection against many household germs* and many bacteria.
- Inhibits many household germs*.
- Inhibits many bacteria growth*.
- Inhibits many household germs* and many bacteria growth.
- Provides effective protection against many household germs*.
- Kills many household germs* in just one minute.
- Kills many bacteria* in just one minute.
- Kills many household germs* and many bacteria in just one minute.
- Kills many household germs*, many bacteria and mold and mildew.
- Kills many household germs*, many bacteria, mold and mildew and *Trichophyton mentagrophytes*, the fungus that causes athlete's foot.
- (Kills) (Eliminates) the source of odors on treated surfaces (in the kitchen) (in the bathroom) (in the home) (- many household germs*, many bacteria and mildew).
- Provides effective protection against mold, mildew and many household germs*.

NOTE TO REVIEWER - If any of the above 18 claims are used on the label, they will be footnoted on the back label as follows:

**Staphylococcus aureus* (Staph), *Streptococcus faecalis* (Strep), *Escherichia coli* (E. coli), *Salmonella choleraesuis* (Salmonella) on hard, inanimate, environmental surfaces.

- (Kills) (Eliminates) (Controls) mold (on (kitchen) (bathroom)(and) (household) surfaces).**
- (Kills) (Eliminates) (Controls) (smelly) mildew (on (kitchen) (bathroom)(and) (household) surfaces).**
- (Kills) (Eliminates) (Controls) mold and mildew (on (kitchen) (bathroom)(and) (household) surfaces).**
- Helps eliminate (smelly) mildew that can grow in even the cleanest homes.**
- Provides effective protection against (mold) (and) (mildew).**

NOTE TO REVIEWER - If any of the above 5 claims are used on the label, they will be footnoted on the back label as follows:

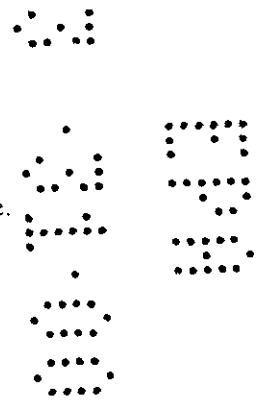
** On hard, inanimate, environmental surfaces.

- Antibacterial
- Antibacterial activity
- Bacteriostatic
- Bactericidal
- Fungistatic
- Fungicidal
- Mildewstatic
- Virucidal
- Kills Herpes Simplex I
- Kills Herpes Simplex II
- Kills Herpes Simplex I and Herpes Simplex II
- Kills *Trichophyton mentagrophytes*, the fungus that causes athlete's foot
- BD1 cleans and disinfects.
- Disinfects as it cleans.
- Disinfects and deodorizes.
- Cleans, shines, and disinfects washable (kitchen) (and) (bathroom) surfaces and fixtures around the home.

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RESIDUAL Sanitizing/Antibacterial/Mold & Mildew Control Claims:

14 day antibacterial activity†:

BD1 stops many bacteria† from coming back for 14 days.

Residual self-sanitizing for 14 days against many bacteria†.

NOTE TO REVIEWER - If any of the above 3 claims are used on the label, they will be footnoted on the back label as follows:

†*Staphylococcus aureus* (Staph), *Escherichia coli* (E. coli), *Klebsiella pneumonia* (Klebsiella) on hard, inanimate, environmental bathroom surfaces between cleanings.

(Kills) (Eliminates) mold and prevents it from re-growing for 14 days. ††

(Kills) (Eliminates) mildew and prevents it from re-growing for 14 days. ††

(Kills) (Eliminates) mold and mildew and prevents them from re-growing for 14 days. ††

Prevents (re-growth) (return) of mold for 14 days. ††

Prevents (re-growth) (return) of mildew for 14 days. ††

Prevents (re-growth) (return) of mold and mildew for 14 days. ††

NOTE TO REVIEWER - If any of the above 6 claims are used on the label, they will be footnoted on the back label as follows:

††On hard, inanimate, environmental bathroom surfaces between cleanings.

(For use on) (Cleans):	Tubs (and glazed tile)	Vanity tops	Household
	Chrome	Shower curtains	Floors
	Sinks	Appliances	Garbage cans
	Counter (tops)	Hard surfaces	Kitchen sills
	Cabinets	Washable walls	
	Shower (stalls) (areas)	Kitchen (areas)	
	Refrigerators	Stove (tops)	
	Window sills	Toilet seats	

Effective on modern washable surfaces like fiberglass, glazed porcelain, Formica®*, stainless steel, synthetic marble, glazed tile, plastic, and vinyl

For other surfaces, spot test in an inconspicuous area

Contains no abrasives, harsh acid or bleach

Won't scratch

Non-abrasive and contains no bleach

No harsh fumes

Bleach-free (formula)

No harsh chemical odor

For best results on cleaning tough soils, allow product to remain on surface longer.

Save money by buying our refill size

45% More Free!

32 oz at the 22 oz price

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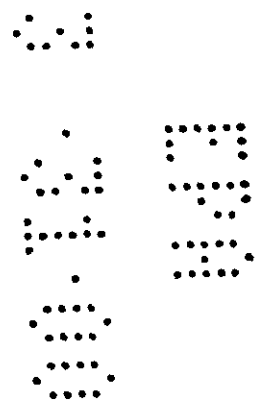
Patented formulation

US Patent 5,411,585

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*Formica® is a registered trademark of Formica Corp.

Important facts: Recyclable packaging
(Contains) no phosphates
Phosphate free
Bottle is made of (at least) 25% post-consumer recycled plastic



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO CLEAN:

Spray 6-8" from surface to be cleaned. Allow (foam) (product) to penetrate (soiled area) (soap scum), (dirt), (and stains). Wipe with wet cloth or sponge. No need to wipe dry. On chrome, rinse with water.

TO CONTROL MOLD AND MILDEW:

Spray surface until thoroughly wet. Leave for at least 1 minute before wiping. Reapply as new growth appears.

FOR RESIDUAL MOLD AND MILDEW CONTROL:

First, clean surface according to "To Clean" directions above. Reapply at least every two weeks or as surface becomes heavily soiled. For best residual results, start using on surfaces that are free of visible mold and mildew stains. This product is residually effective on hard, inanimate, environmental bathroom surfaces between cleanings for 14 days.

FOR RESIDUAL ANTIBACTERIAL CONTROL:

First clean surface according to "To Clean" directions above. Spray surface until thoroughly wet. Leave for at least 1 minute before wiping. This product is residually effective on hard, inanimate, environmental bathroom surfaces between cleanings for 14 days.

TO DISINFECT:

Spray surface until thoroughly wet. Leave for at least 1 minute before wiping. For heavily soiled surfaces, first clean surface according to Clean Directions.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin, and clothing. Wash hands thoroughly with soap and water after use.

FIRST AID:

If in eyes: Flush with plenty of water. If irritation persists, get medical attention.

If on skin: Wash promptly with plenty of soap and water. Get medical attention.

STORAGE & DISPOSAL:

STORAGE: Store in a cool, dry area inaccessible to children.

DISPOSAL: Do not reuse empty container (except when using refill pack). To discard empty container wrap container and put in trash.

Questions? Comments? Call 800-558-5252 or write Helen Johnson

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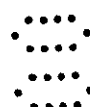
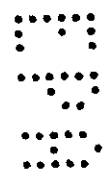
EPA Reg. No. 4822-484

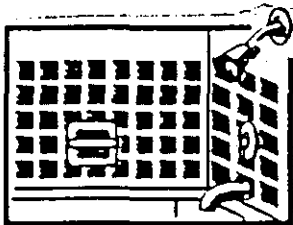
EPA Est. No. 4822-WJ-1

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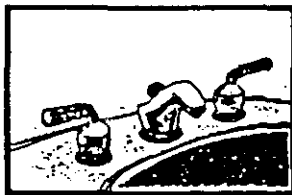
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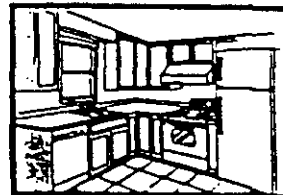




TUB AND SHOWER AREAS



SINKS AND CHROME



KITCHEN AREAS

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