7-28-1998 4822-504 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**JUL 2 8 1998** 

S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-22236

ATTN: Sandra K. Baugh, Registration Specialist

SUBJECT: Tough Act The Heavy Duty Bathroom Cleaner EPA Registration No. 4822-504 Amendments Dated June 25 and 29, 1998

Dear Ms. Baugh:

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A review of your label for the June 25 amendment showing the highlighted changes made to your resubmission is acceptable. The amendment for this submission is acceptable. A stamped copy is enclosed for your records.

This will also acknowledge receipt of your notification, in accordance with PR Notice 95-2, with some minor label changes. The changes made by you "To Kills germs and viruses..." to Kills germs and Kills viruses..." is acceptable. The application is now a part of the records for this registration.

Sincerely.

Velma Noble Team Leader 31 Regulatory Management Branch I Antimicrobial Division (7510W)

| CONCURRENCES |         |   |   |  |  |  |  |  |
|--------------|---------|---|---|--|--|--|--|--|
| SYMBOL       | 7150W   |   |   |  |  |  |  |  |
| SURNAME      | Phrile  | ] | 1 |  |  |  |  |  |
| DATE         | 7-28-95 |   |   |  |  |  |  |  |

EPA Form 1320-1A (1/90)

# TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER

| BIG JOBS                               | · · · · · · · · · · · · · · · · · · ·        |
|--|--|
| BIG JOB SIZE                           | KILLS SALMONELLA CHOLERAESUIS (SALMONELLA)!  |
| CLEANS & DISINFECTS                    | KILLS STAPHYLOCOCCUS AUREUS (STAPH)          |
| CLEANS & SHINES                        | STREPTOCOCCUS PYOGENES (STREP)               |
| CLEANS & SHINES WITHOUT SCRATCHING!    | SALMONELLA CHOLERAESUIS (SALMONELLA)         |
| CLEANS, SHINES DISINFECTS, DEODORIZES  | PSEUDOMONAS AERUGINOSA (PSEUDOMONAS)         |
| CUTS GREASE                            | ESCHERICHIA COLI (E. COLI)                   |
| CUTS TOUGH KITCHEN GREASE!             | CAMPYLOBACTER JEJUNI                         |
| DISINFECTS AND DEODORIZES!             | SHIGELLA DYSENTERIAE                         |
| LEAVES A STREAK FREE SHINE!            | TRICOPHYTON MENTAGROPHYTES                   |
|  | (ATHLETE'S FOOT FUNGUS)                      |
| KILLS HOUSEHOLD GERMS                  |  |
| KILLS VIRUSES*                         |  |
| KILLS HOUSEHOLD GERMS AND ODOR-CAUSING | VIRUSES* SUCH AS HERPES SIMPLEX VIRUS TYPE 1 |
| GERMS!                                 | (CAUSES COLD SORES)                          |
| MAXIMUM CLEAN PLUS ANTIBACTERIAL       | HERPES SIMPLEX VIRUS TYPE 2                  |
|  | (CAUSES GENITAL HERPES)                      |
| MICROSCOPICALLY CLEAN                  | INFLUENZA A <sub>2</sub> (HONG KONG)         |
| NO-SCRATCH FORMULA                     | RESPIRATORY SYNCYTIAL VIRUS (RSV)            |
| NOT JUST CLEAN, MICROSCOPICALLY CLEAN  | RHINO VIRUS TYPE 37                          |
| NOW KILLS HOUSEHOLD GERMS! †           |  |
| NOW KILLS BACTERIA! +                  |  |
| REMOVES TOUGH SOAP SCUM EASILY!        |  |
| SHINES PLUS KILLS HOUSEHOLD GERMS      | LIGHT FRESH SCENT                            |
| STREAK FREE                            | SPRINGTIME FRESH SCENT                       |
| STREAK FREE SHINE                      | SPRING BREEZE SCENT                          |
| VIRUCIDAL*                             | SUMMER BREEZE SCENT                          |
| WE WORK HARD SO YOU DON'T HAVE TO!®    | MORNING FRESH SCENT                          |
|  | SPRINGTIME BREEZE SCENT                      |
|  | MOUNTAIN MIST SCENT                          |
|  | COUNTRY FRESH SCENT                          |
|  | CRYSTAL FRESH SCENT                          |
|  | FRESH FLORAL SCENT                           |
|  | FRESH MEADOW SCENT                           |
|  | COUNTRY MEADOW SCENT                         |

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 28 1998 Under the Pederal Insecticide, Purgicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 4822-504

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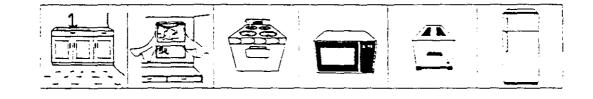


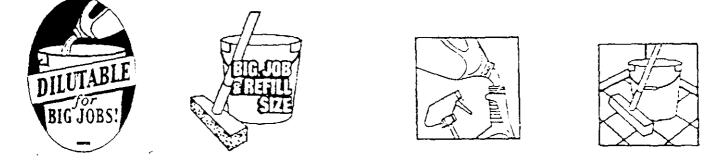
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| Active ingredients:               | -  | 0.4404 |
|-----------------------------------|--|--------|
| n-Alkyl (60% C14, 30% C16,        | 5% C12, 5% C18) dimethyl benzyl ammonium chlorides |        |
| n-Alkyl (68% C12, 32% C14)        | dimethyl ethylbenzyl ammonium chlorides            |        |
| Inert ingredients (includes de    | stergents and cleaners)                            |        |
| Contains no bleach or phosphates. | Safe for septic systems.                           |        |

# CAUTION: KEEP OUT OF REACH OF CHILDREN See back panel for additional precautionary statements.

NET 16 FL. OZ. (1 PT.) 473mL NET 17 FL. OZ. (1 PT. 1 OZ.) 502 mL NET 22 FL. OZ. (1 PT. 6 OZ.) 650 mL NET 32 FL. OZ. (2 PTS.) 946 mL NET 64 FL. OZ. (2 QTS.) 1.89 L

\*See back panel for specific viruses †See back panel for specific organisms ACCEPTED with COMMENTS in EPA Letter Dated: JUL 2-8 1998

Under the Federal Insecticide. Pungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 4822-504

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or

Dow has a cleaning solution for every room in your home:



#### For the entire house

Tough Act® has Scrubbing Bubbles®, whose foaming action thoroughly cleans, shines, disinfects and deodorizes. No scrubbing required. Specially formulated to attack soap scum, hard water stains and dirt. Controls mold and mildew

growth on hard, nonporous surfaces. **Kills household gerns**<sup>†</sup>: Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuis (Salmonella), Trichophyton mentagrophytes (Athlete's foot fungus), Pseudomonas aeruginosa (Pseudomonas), and viruses\*: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysenteriae on environmental surfaces. Effective on countertops\*, appliances, cabinets, exhaust fans, microwave ovens, floors, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, sinks, basins, and chrome fixtures. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces. Leaves a brilliant shine and a fresh, clean scent.

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Tough Act® The Heavy Duty Bathroom Cleaner thoroughly cleans, shines, disinfects and deodorizes. Specially formulated to attack soap scum, hard water stains and dirt. Controls mold and mildew growth on hard, nonporous

surfaces. Kills household germs<sup>†</sup>: Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuls (Salmonella), Trichophyton mentagrophytes (Athlete's foot fungus), Pseudomonas aeruginosa (Pseudorfionas), and viruses\*: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysenteriae on environmental surfaces. Effective on tubs, showers, basins, ceramic tile, stainless steel and chrome fixtures, fiberglass and porcelain surfaces. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch suffaces. Leaves a brilliant shine and a fresh, clean scent.

# or

With this DOW product, you can be sure your home doesn't just look clean, it's *microscopically clean*. This DOW product does it all – cleans, shines, deodorizes and disinfects – for a complete clean. Unlike ordinary cleaners and disinfectants, this effective, versatile cleaner not only wipes out tough grease and grime, it kills food-related bacteria and odor-causing germs: Salmonella choleraesuis (Salmonella), Streptococcus pyogenes (Strep), Staphylococcus aureus (Staph), and Trichophyton mentagrophytes (Athlete's Foot Fungus), Pseudomonas aeruginosa (Pseudomonas), and viruses\*: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysenteriae on environmental surfaces, all around the house, even on glass! All that's left behind is a light fresh scent and a streak-free shine.

For the first time ever, the cleaning experts at DOW have combined the latest cleaning technology with antibacterial disinfectants, so there's nothing left behind but a brilliant, streak-free shine, plus a light fresh scent. You can be sure your home not only looks clean, it's completely clean.

EFFECTIVE ON countertops<sup>1</sup>, appliances, large appliances, cabinets, exhaust fans, microwave ovens, floors, wails, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, sinks, basins, and chrome fixures. Shines glass and shiny surfaces. For all other surfaces, including painted surfaces, spot test in a small, inconspicuous area first,

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 28 1998

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### or

Tough Act® has combined its powerful cleaners with antibacterial ingredients to kill bacteria: Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuis (Salmonella), Trichophyton mentagrophytes (Athlete's foot fungus), Pseudomonas aeruginosa (Pseudomonas), and odor causing germs and viruses\*: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysentenae on environmental surfaces. Now you can disinfect as you cut through even the toughest greasy dirt leaving surfaces with a sparkling streak-free shine. Your kitchen is left with a fresh lemon scent that makes it smell as clean as it looks. Controls mold and mildew growth on hard, nonporous surfaces. Effective on countertops\*, appliances, cabinets, exhaust fans, microwave ovens, floors, ceramic tile, stainless steel, chrome, fiberglass, porcelain surfaces, tubs, showers, sinks, basins, and chrome fixtures. For all other surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces.

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DOW brings you this powerful scientifically advanced cleaning product that does it all - cuts grease streak-free and kills

household germs<sup>1</sup>: Selmenella choleraesuis (Salmonella), Streptococcus pyogenes (Strep), Staphylococcus aureus (Staph), and Trichophyton mentagrophytes (Athlete's Foot Fungus), Pseudomonas aeruginosa (Pseudomonas), and viruses<sup>\*</sup>: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncytial virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysenteriae on environmental surfaces. The cleaning experts at DOW combined the streak-free, grease cutting power of Tough Act® with antibacterial disinfectants so you can get the *maximum* clean for your home.

Maximum cleaning power
Cuts tough kitchen grease
Maximum streak-free shine
Kills household germs
Fresh clean scent
Fresh clean i emon scent

Big Jobs: • Floors • Walls • Large Appliances

Effective on: Countertops<sup>+</sup>, Sinks, Appliances, Large Appliances, Cabinets, Microwave Ovens, Floors, Walls, Ceramic Tile, Stainless Steel, Chrome, Fiberglass, Porcelain Surfaces and More - Tubs, Showers, Basins, and Chrome Fixtures. For all other surfaces, spot test in an inconspicuous area.

## or

With this hardworking DOW product, your home not only looks clean, it's microscopically clean. Unlike ordinary glass and surface cleaners, this scientifically advanced formula leaves a brilliant, streak-free shine, plus kills common

household germs<sup>†</sup>: Salmonella choleraesuis (Salmonella), Streptococcus pyogenes (Strep), Staphylococcus aureus (Staph), and Trichophyton mentagrophytes (Athlete's Foot Fungus), Pseudomonas aeruginosa (Pseudomonas), and viruses<sup>+</sup>: Herpes simplex virus type 1 (causes cold sores), Herpes simplex type 2 (causes genital herpes), Influenza A<sub>2</sub> (Hong Kong), Respiratory syncyttal virus (RSV), Rhino virus type 37, Escherichia coli (E. coli), Campylobacter jejuni, and Shigella dysenteriae on environmental surfaces.

DOW science has combined the best glass and surface cleaning technology with antibacterial disinfectants so you can

get a clean, shiny surface, while killing household germs<sup>1</sup>. Perfect for high-touch areas like doors, windows, tabletops appliances and countertops •, where food germs, hand prints, or pet smudges appear.

Use throughout your home to clean, shine, and disinfect on shiny surfaces like glass, windows, mirrors, countertops+, appliances, chrome, stainless steel, aluminum, ceramic tile, porcelain surfaces, fiberglass, and patio doors. For all other surfaces, spot test in an inconspicuous area. Not recommended for wood or varnished surfaces.

ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 28 1998

Under the Federal Insecticide, Rungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. / 822 504

#### Directions For Use for trigger foamer:

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. To use, lift flap and lock into arrow on top of trigger foamer. Do not operate when flap is closed. TO CLEAN, hold 6-8 inches from surface. Spray with quick, full strokes. Allow foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge, rinse with water. TO DISINFECT, reapply covering entire surface with foam. Allow surface to remain wet for 10 minutes. Thoroughly rinse all wetted and cleaned surfaces with potable (tap) water. Then wipe. TO PREVENT MOLD AND MILDEW GROWTH on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears. \*Make sure the product does not contact food. TO REFILL: Remove trigger sprayer from empty bottle. Unscrew cap on refill and pour contents directly into empty bottle. Replace trigger sprayer and use as you normally would. FOR FLOORS AND BIG JOBS: Mix 1 cup of Tough Act® with 1 gallon of water. Apply with mop or sponge. Cleans all washable floors including no-wax, linoleum, vinyl, and ceramic tile. Use full strength for tough greasy stains. For spot cleaning floors, apply straight from bottle and wipe clean with damp sponge or mop.

#### Directions For Use for non-foamer trigger:

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DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. TO USE, lift flap and lock into arrow on top of trigger. Do not operate when flap is closed. FOR GENERAL HOUSEHOLD CLEANING, hold 6-8 inches from surface, spray surface then wipe with a dry paper towel or lint-free cloth. No rinsing necessary. TO DISINFECT/DEODORIZE, reapply covering entire surface with spray. Allow surface to remain wet for 10 minutes. Thoroughly rinse all wetted and cleaned surfaces with potable (tap) water. Then wipe. TO PREVENT MOLD AND MILDEW GROWTH on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears. Do not use on eating utensils, plates or glasses. \*Make sure the product does not contact food. TO REFILL: Remove trigger sprayer from empty bottle. Unscrew cap on refill and pour contents directly into empty bottle. Replace trigger sprayer and use as you normally would. FOR FLOORS AND BIG JOBS: Mix 1 cup of Tough Act® with 1 gallon of water. Apply with mop or sponge. Cleans all washable floors including no-wax, linoleum, vinyl, and ceramic tile. Use full strength for tough greasy stains. For spot cleaning floors, apply straight from bottle and wipe clean with damp sponge or mop.

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUSES EYE IRRITATION. Avoid contact with eyes. FIRST AID: In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists. STORAGE: Store out of the reach of children. DISPOSAL: Do not reuse empty container, discard in trash.

EPA Reg. No. 4822-504. EPA Est. No. 4822-WI-1

Questions? Comments? Call TOLL-FREE 1-800-558-5252 or write Helen Johnson. ©1998 S. C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236 U.S.A. All right reserved. U.S. Des. Patents 342,678 & 358,198 ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 28 1998

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