01-07-2010

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN -7 2010

Ms. Maren E. Grow **Registration Specialist** S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236

#### SUBJECT:

4822-504

Tough Act<sup>®</sup> The Heavy Duty Bathroom Cleaner EPA Registration Number: 4822-504 Application Date: October 9, 2009 Receipt Date: October 13, 2009

Dear Ms. Grow:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below:

1) Revise the Ingredients Statement on page one to include the following: "Total.....100%". Delete the phrase: "(includes detergents and cleaners)". If making reference to any of the inert ingredients, all inert ingredients must be listed on the label.

2) Revise the list of surfaces on page one to be more specific as follows: "exterior surfaces of appliances" "chrome fixtures" "bathtubs, basins and showers made of sealed fiberglass"

"exterior surfaces of microwave ovens"

"stainless steel fixtures"

3) Revise the first paragraph on page four to indicate the specific surfaces to be treated as follows: "exterior surfaces of appliances", "exterior surfaces of microwave ovens" and "sealed fiberglass."

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EPA Form 1320-1A (1/90)

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4) Revise the second paragraph on page four to indicate the specific surfaces to be treated as follows: "*sealed* fiberglass."

5) Revise the first full paragraph on page five to indicate the specific surfaces to be treated as follows: "exterior surfaces of appliances", "exterior surfaces of microwave ovens" and "sealed fiberglass."

6) Revise the statement on page five beginning: "S.C. Johnson science has combined the best glass and surface..." to indicate the specific surfaces to be treated as follows: "*exterior surfaces of* appliances."

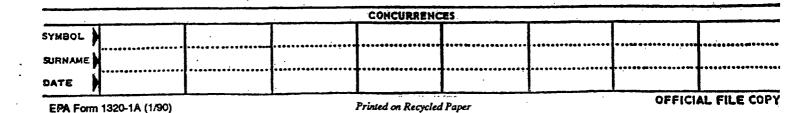
7) Revise the statement on page five beginning: "Use throughout your home to clean..." to indicate the specific surfaces to be treated as follows: "*exterior surfaces of* appliances" and "*sealed* fiberglass."

8) Your product is not approved for use on food contact surfaces. Thus revise the statement on page six (which appears twice) to state: "When using *on countertops*, stoves or *exterior surfaces of* appliances, thoroughly rinse all wetted and cleaned surfaces with potable (tap) water. Make sure the product does not contact food."

9) Delete the repetitive heading and statement in the middle of page six: "DIRECTIONS FOR USE" and "It is a violation of Federal...with its labeling." Your label only includes one set of directions for use. The headings "For trigger foamer" and "For non-foamer trigger" are sufficient.

10) Revise the Precautionary Statements to be in agreement with the Label Review Manual as follows: "...Wash thoroughly with soap after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

11) Should you wish to retain a reference to the company's website on your label; then please be aware that such a reference transforms the website into labeling under the Federal Insecticide Fungicide and Rodenticide Act sec 2 (p) (2) and then the website is subject to review by the Agency. If the website content is false or misleading, the product would be misbranded and its sale or distribution unlawful to sell or distribute under FIFRA section 12(a)(1)(E). In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Although EPA has not yet determined the extent to which it will routinely review company websites, if the Agency finds or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from claims approved through the registration process, the website may be referred to the EPA's Office of Enforcement and Compliance Assurance.



# **General Comments**

A stamped copy of the accepted labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,

Velma Noble Product Manager (31) Regulatory Management Branch I Antimicrobials Division (7510P)

7510P:T.Lantz:1/6/2010:4822-504 accepted label amend Enclosure: Stamped accepted label

SURNAME	· · · · · · · · · · · · · · · · · · ·
DATE	*****

EPA Form 1320-1A (1/90)

## TOUGH ACT® THE HEAVY DUTY BATHROOM CLEANER (master name)

S.C. JOHNSON (A Family Company)

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Active ingredients:

n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethyl benzyl ammonium chlorides	0.11%
n-Alkyl (68% C12, 32% C14) dimethyl ethylbenzyl ammonium chlorides	0.11%
Inert ingredients (includes detergents and cleaners)	99.78%

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

NET 4 - 160 FL. OZ.

Big jobs: floors, walls, large appliances   Bottle made of 25% post-consumer plastic   Cleans & disinfects   Cleans & shines   Cleans & shines without scratching!   Cleans, shines, disinfects, deodorizes   Cleans & shines, disinfects, deodorizes   Cleans & shines, disinfects, deodorizes   Cleans & shine your entire home!   Cleans without scrubbing   Complete clean!   Contains no bleach or phosphates   Cuts grease   Cuts tough grease and (&) grime!   Cuts tough grease and (&) grime!   Cuts tough kitchen grease!   Disinfects and deodorizes!   Disinfects as it cleans   Dissolves tough soap scum on contact   Effective on) (:)   appliances   basins   cabinets   glazed ceramic tile   chrome   chrome fixtures   countertops   exhaust fans	ACCEPTED with COMMENTS in EPA Letter Dated: JAN - 7 2010 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 4	822 - 50	0 4
fiberglass floors large appliances microwave ovens glazed porcelain (surfaces) - disinfects stainless steel showers sinks tubs walls	exterior surfaces of the toilet	ی دون د و و و د و و د و و د و د و د و د و د و	0000 0000 0000 0000 0000 0000 0000 0000 0000

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For the dirt you can see and the household germs† you can't For the entire house Guaranteed to clean or your money back (see back panel) Household surfaces Kills > 99.9% of household germs +! Kills greater than 99.9% of household germs †! (:) Kills more than 99.9% of household germs†! Kills common household germs† Kills household germs†! Kills household germst and odor-causing bacteria! Kills viruses\* Kitchen surfaces Leaves a brilliant shine Leaves a streak-free shine! Leaves no residue! Leaves no greasy residue! Leaves no gritty residue Leaves no smeary residue! Lemon Power® Maximum clean plus antibacterial Maximum cleaning power Maximum streak-free shine! Microscopically clean New Easy Grip Trigger No-scratch formula No smeary residue Not just clean, microscopically clean Now kills household germs!† Now kills bacteria!† Passes the finger swipe test! No residue! Removes the soap scum and dirt that allow (household germs<sup>+</sup>), (viruses<sup>\*</sup>) (and) (mildew) to survive Removes soap scum easily! Removes tough soap scum easily! Safe for septic systems Shines glass and shiny surfaces. For all other hard, non-porous surfaces, including painted surfaces, spot test in a small, inconspicuous area first. S.C. Johnson has a cleaning solution for every room in your home \*See back panel for specific viruses †See back panel for specific organisms Shines plus kills household germst Streak free! Streak free shine Such tough cleaning that it doesn't leave a residue! Such tough cleaning that it leaves no greasy residue! Such tough cleaning that it leaves nothing behind! Tough cleaning! Tough cleaning without the residue! Tough on grease and grime! Tough on grime! Tougher on grime! U (symbol for approved as "Kosher") Use throughout kitchen and bathroom Use throughout the whole house! Versatile cleaner for all your bathroom surfaces Virucidal\* We work hard so you don't have to®!

Wipes out tough grease and grime! Won't scratch surfaces

(Kills) (:) Salmonella choleraesuis (Salmonella) (!) Staphylococcus aureus (Staph) Streptococcus pyogenes (Strep) Pseudomonas aeruginosa (Pseudomonas) Escherichia coli (E. Coli) Campylobacter jejuni Shigella dysenteriae T. mentagrophytes, the agent that causes Athlete's foot fungus

Kills viruses\*: Herpes Simplex Virus Type 1 (causes cold sores) Herpes Simplex Virus Type 2 (causes genital herpes) Influenza A<sub>2</sub> (Hong Kong) Respiratory Syncytial Virus (RSV) Rhino Virus Type 37

Fresh clean scent! Light fresh scent Springtime fresh scent Spring breeze scent Summer breeze scent Morning fresh scent Springtime breeze scent Mountain mist scent Country fresh scent Crystal fresh scent Fresh floral scent Fresh meadow scent Country meadow scent (Glade®) Rainshower scent (Glade®) Ocean breeze scent (Glade®) Natural spring scent (Glade®) Tender breeze scent (Glade®) Neutralizer (Glade®) Refreshing citrus scent Fresh clean citrus scent Fresh clean lemon scent (!)

Better value per ounce Big job size Bigger size Bigger size – Better value Bigger size – Improved value Everyday value pack Gallon size! Larger size – Better value per ounce New bigger size New size New size! Better value! New! 2 liter refill New! 2 liter refill New! 2 liter size New! 2 liter value size New! 32 oz. value pack

Refill (size) (!)

Refill size available Value pack Value size 2 liter refill 2 liter size 25% free! 25% more! 25% more free! 30% more free 45% free! 45% more! 45% more free! 45% more than 22 oz. Value Size 45% more than 22 oz. 22.1 oz. at the 17 oz. price 32 ozs. at the 22 oz. price! 80 ozs. at the 64 oz. price!

Improved Fragrance! Improved Scent! New! New Fragrance! New Scent! New (and) (&) Improved Fragrance! New (and) (&) Improved Scent!

(This product), 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 germs†: *Staphylococcus aureus* (Staph), *Streptococcus pyogenes* (Strep), *Salmonella choleraesuis* (Salmonella), *T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa* (Pseudomonas), *Escherichia coli* (E. coli), Campylobacter jejuni and Shigella dysenteriae 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) and Rhino virus type 37 on environmental surfaces. Effective on countertops, appliances, cabinets, exhaust fans, microwave ovens, floors, glazed ceramic tile, stainless steel, chrome, fiberglass, glazed porcelain (surfaces) - disinfects exterior surfaces of the toilet, tubs, showers, sinks, basins, and chrome fixtures. For all other hard, non-porous 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.

#### OR

(This product), 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†: *Staphylococcus aureus* (Staph), *Streptococcus pyogenes* (Strep), *Salmonella choleraesuis* (Salmonella), *T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa* (Pseudomonas), *Escherichia coli* (E. coli), Campylobacter jejuni and Shigella dysenteriae 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) and Rhino virus type 37 on environmental surfaces. Effective on tubs, showers, basins, glazed ceramic tile, stainless steel and chrome fixtures, fiberglass and glazed porcelain (surfaces) - disinfects exterior surfaces of the toilet. For all other hard, non-porous 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.

#### OR

(With this S.C. Johnson product) (This product), you can be sure your home doesn't just look clean, it's microscopically clean. This S.C. Johnson 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 bacteria: Salmonella choleraesuis (Salmonella), *Streptococcus pyogenes* (Strep), *Staphylococcus aureus* (Staph), *T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa* (Pseudomonas), *Escherichia coli* (E. coli), Campylobacter jejuni and Shigella dysenteriae 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) and Rhino virus type 37 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. The cleaning experts at S.C. Johnson 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.

#### OR

(This product) has combined its cleaners with antibacterial ingredients to kill bacteria: Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Salmonella choleraesuis (Salmonella), T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa (Pseudomonas), Escherichia coli (E. coli), Campylobacter jejuni and Shigella dysenteriae and odor causing bacteria 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) and Rhino virus type 37 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, glazed ceramic tile, stainless steel, chrome, fiberglass, glazed porcelain (surfaces) - disinfects exterior surfaces of the toilet, tubs, showers, sinks, basins, and chrome fixtures. For all other hard, non-porous surfaces, spot test in an inconspicuous area. Contains no abrasives, so it can't scratch surfaces.

#### OR

S.C. Johnson brings you this scientifically advanced cleaning product that does it all - cuts grease streak-free and kills household germs†: Salmonella choleraesuis (Salmonella), Streptococcus pyogenes (Strep), Staphylococcus aureus (Staph), T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa (Pseudomonas), Escherichia coli (E. coli), Campylobacter jejuni and Shigella dysenteriae 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) and Rhino virus type 37 on environmental surfaces. The cleaning experts at S.C. Johnson combined the streak-free, grease cutting power of Tough Act® with antibacterial disinfectants so you can get the maximum clean for your home.

#### OR

(With this hardworking S.C. Johnson product) (This 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†: *Salmonella choleraesuis* (Salmonella), *Streptococcus pyogenes* (Strep), *Staphylococcus aureus* (Staph), *T. mentagrophytes, the agent that causes Athlete's foot fungus, Pseudomonas aeruginosa* (Pseudomonas), *Escherichia coli* (E. coli), Campylobacter jejuni and Shigella dysenteriae 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) and Rhino virus type 37 on environmental surfaces.

S.C. Johnson 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>†</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, glazed ceramic tile, glazed porcelain (surfaces) - disinfects exterior surfaces of the toilet, fiberglass, and patio doors. For all other hard, non-porous surfaces, spot test in an inconspicuous area. Not recommended for wood or varnished surfaces.

(TO OPERATE: Rotate nozzle to "ON" position and spray.)

#### 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 CLEAN AND DEODORIZE**, 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/DEODORIZE**, pre-clean heavily soiled surfaces prior to disinfection. Hold 6-8" from the surface. Spray with quick, full strokes covering surfaces completely. Allow surfaces to remain wet for 10 minutes. Then wipe.

**TO PREVENT MOLD AND MILDEW GROWTH** on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears.

**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®) (this product) with 1 gallon of water. Apply with mop or sponge. Cleans all washable floors including no-wax, linoleum, vinyl, and glazed 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.

When using on food contact surfaces such as countertops, stoves or appliances, thoroughly rinse all wetted and cleaned surfaces with potable (tap) water. Make sure the product does not contact food.

Do not use on eating utensils, plates or glasses.

NOTE TO REVIEWER: The statement below will only be used if the final printed label sites bathrooms and glazed porcelain surfaces

Not for use as a disinfectant on interior surfaces of toilet bowls.

Directions For Use for non-foamer trigger:

DIRECTIONS FOR USE:

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

**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**, pre-clean heavily soiled surfaces prior to disinfection. Hold 6-8" from the surface. Spray with quick, full strokes covering surfaces completely. Allow surfaces to remain wet for 10 minutes. Then wipe.

TO PREVENT MOLD AND MILDEW GROWTH on hard, nonporous surfaces, spray thoroughly. Reapply as new growth appears.

**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®) (this product) with 1 gallon of water. Apply with mop or sponge. Cleans all washable floors including no-wax, linoleum, vinyl, and glazed 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.

When using on food contact surfaces such as countertops, stoves or appliances, thoroughly rinse all wetted and cleaned surfaces with potable (tap) water. Make sure the product does not contact food.

Do not use on eating utensils, plates or glasses.

# NOTE TO REVIEWER: The statement below will only be used if the final printed label sites bathrooms and/or glazed porcelain surfaces.

Not for use as a disinfectant on interior surfaces of toilet bowls.

## PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

**CAUTION:** CAUSES MODERATE EYE IRRITATION. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

Note to Reviewer: Boxed format or bullets may be used in First Aid section if label space permits.

**FIRST AID:** Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **If in eyes**, hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

**If on skin or clothing**, take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

**STORAGE & DISPOSAL(:) STORAGE:** STORE OUT OF THE REACH OF CHILDREN.

DISPOSAL: Do not reuse or refill this container with any product other than (This Product) refill. Offer for recycling, if available. [For trigger spray bottle, intended to be refilled from refill size container]

DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. [For refill size container]

EPA Reg. No. 4822-504

EPA Est. No. 4822-WI-1(A); 11525-IL-1(B); 55179-IN-1(C); 8155-OH-1(D); 54487-GA-1(E), 71681-IL-2 (F) Lot number suffix (A), (B), (C), (D), (E) or (F) indicates appropriate establishment number. Questions? Comments? Call 800-558-5252 (800-354-1451) or write Helen Johnson. **Sold by:** ©(2001) (2002) (2003) (2004) (2005) S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved.

U.S. Des. Patents:

(Trigger/bottle) (342,678 & 358,198) (128 oz.) (413,517) (67.6 oz.) (417,622)

(Visit our web site at) (www.fantastikcleaners.com)