

4822-505

1-8-2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Ms. Sandra Baugh
Registration Specialist
SC Johnson & Son
1525 Howe Street
Racine, WI 53403

JAN - 8 2002

Subject: Dow Aerosol Disinfectant Bathroom Cleaner
EPA Registration No. 4822-505
Amendment Date: October 9, 2001
EPA Receipt Date: October 10, 2001

Dear Ms. Baugh,

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

- Update First Aid Statements per PR Notice 2001-1

Conditions

Revise the label as follows:

Page 1:

1. Delete the phrase, "[for use on institutional/commercial supplemental registrant products only]." If you want to keep this statement, you will need to clarify the meaning of this statement. Alternatively, you may rephrase it to state "For Institutional and Commercial Use Only."
2. Delete "Improved" from the "New and Improved" claim because it is misleading according to PR Notice 91-7. However, the "new" claim is allowed on the label for 6 months. In an effort to be consistent with the other SC Johnson product labels, you may use "improved" in reference to the fragrances in this product's formulation.
3. Pages 1 and 2: Revise the claim, "Kills odor causing germs" to "Kills odor causing *bacteria*." You can not blend a non-public health claim, "odor causing," with a public health claim, "germs."

CONCURRENCES

SYMBOL							
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Page 2:

- 4. Revise the phrase, "For all other surfaces," to read "For all other *hard, non-porous* surfaces."
- 5. The surfaces, "tile, porcelain, ceramic tile, porcelain surfaces," must be qualified as hard, non-porous by stating glazed; for example, "*glazed porcelain surfaces.*"
- 6. Since this product only supports claims against bacteria and fungi, "*S. aureus, P. aeruginosa, S. pyogenes, S. choleraesuis, and T. mentagrophytes,*" a claim against "germs" is false and misleading. To make a "germs" claim, you must submit data demonstrating this product is effective against bacteria, viruses, and fungi. Therefore, you will need to revise the claim, "Kills common germs" to state "Kills common *bacteria...*"
- 7. The *T. mentagrophytes* claim will need to be revised by deleting "{Athlete's foot fungus}" and removing the parenthesis around the statement, "the agent that causes athletes foot fungus."
- 8. Since a deodorization claim is made on the label, you will need to incorporate this claim in the directions by either adding "*Deodorize*" to the "To Clean" or "To Disinfect" directions.
- 9. Revise the "To Disinfect" directions by stating "*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.*"
- 10. Since this product is used in bathrooms on porcelain surfaces and efficacy data was not submitted to support interior toilet bowl disinfection, you will need to either state "*disinfect exterior surfaces of the toilet*" or add the following directions: "*Empty water from toilet bowl or urinal. Hold 6-8" from surface. Spray covering exposed surfaces. Brush thoroughly over surfaces including under the rim to completely wet surfaces, let stand for 10 minutes, then flush.*"

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling. If you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely,



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

DOW AEROSOL DISINFECTANT BATHROOM CLEANER

() indicates optional text

Antibacterial
 Cleans & Deodorizes
 Cleans & Shines without Scratching!
 Cleans, Shines, Disinfects & Deodorizes
 Cleans, Shines, Disinfects, Deodorizes, No-Scratch Formula
 Cleans, Shines, Disinfects & Deodorizes!
 Disinfects and Deodorizes!
 "For Export Only"
 From the makers of Windex®
 Institutional
 Kills odor-causing germs
 New!
 New and Improved
 No-Scratch Formula
 (Not for Retail Sale) (For use on Institutional Use / Commercial Use supplemental registrant products only)
 Removes Soap Scum Easily!
 We work hard so you don't have to!
 With Scrubbing Bubbles®
 Won't Scratch Fiberglass!

Fresh Clean Scent
 Garden Bloom (Scent)
 Natural Spring (s) (Scent)
 Mountain Spring (Scent)
 Ocean Breeze (Scent)
 Ocean Mist (Scent)
 Rainshower Clean (Scent)
 Spring Fresh (Scent)
 Spring Mist (Scent)
 Spring Zest (Scent)
 Spring Blossom (Scent)
 Tender Breeze (Scent)
 Tropical Rain (Scent)
 Waterfall Mist (Scent)

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:*** 99.78%

Contains 6% hydrocarbon propellant.
 ***An aqueous solution of detergents, cleaners, chelants and perfumes.
 (Contains no phosphates)

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back panel for additional precautionary statements.

NET WT. 17 OZ. (1 LB. 1 OZ.) 481g
 or NET WT. 20.4 OZ. (1 LB. 4.4 OZ.) 576g
 or NET WT. 25 OZ. (1 LB. 9 OZ.) 706g

ACCEPTED
 with COMMENTS
 in EPA Letter Dated:
 JAN - 8 2002

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 registered under FIFRA Reg. No. 4822-505

It's easy!...Right after showering or bathing, spray all wet surfaces with product...JUST SPRAY and GO!
Prevents Soap Scum Build-Up & Mildew Stain! No Wiping. No Scrubbing. Spray Daily. When used as directed,
product prevents build-up of soap scum and mold & mildew stains with no scrubbing or wiping so you have to clean
less often. Its advanced formula with sheeting action keeps soap scum, mineral deposits and mildew stains from
building up so your shower and tub stay sparkling clean.

Dow Aerosol Disinfectant Bathroom Cleaner is scrub (-) brush tough on dirt—gentle as a bubble on these surfaces!
Cleans and shines...bathroom fixtures, tile, chrome, fiberglass, baked enamel, porcelain, vinyl, stainless steel,
synthetic marble. For all other surfaces, spot test in an inconspicuous area. Not recommended for use on acrylic
brass or marble. Recommended use areas: homes, motels, hospitals. Dow Aerosol Disinfectant Bathroom Cleaner
kills odor-causing germs (,) and smells nice! Kills odor-causing germs, Staphylococcus aureus (Staph), and
Trichophyton mentagrophytes (Athlete's foot fungus) (the agent that causes athlete's foot fungus). Removes mold
and mildew stains and odors.

(Only) Dow Aerosol Disinfectant Bathroom Cleaner (gives you Scrubbing Bubbles®) (gives you Lemon Power® and
Scrubbing Bubbles®), (whose) foaming action thoroughly cleans, shines, disinfects (and deodorizes) (for you) (with a
fresh pleasant lemon scent) (.) No scrubbing required!

- Easily removes soap scum, hard water stains, and dirt (.)
- Has a fresh, clean lemon scent (.)
- Kills common germs:(.) (like) Staphylococcus aureus (Staph), (&) Streptococcus pyogenes (Strep)
(.) (.) Trichophyton mentagrophytes (Athlete's foot fungus) (the agent that causes athlete's foot
fungus).
- Controls mold & mildew growth (.)
- Won't scratch surfaces...leaves a brilliant shine (!)

Effectively cleans tubs, showers, basins, ceramic tile, stainless steel, chrome, fixtures, fiberglass, and porcelain
surfaces. (Spot test for all other surfaces; not recommended for use on acrylic, brass or marble).

DIRECTIONS FOR USE (:)

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

SHAKE WELL BEFORE AND DURING USE (:)

TO CLEAN (:), Point arrow on spray button to mark on rim. Spray 6-8 inches from surface to be cleaned. Allow
foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge. No need to wipe dry. On chrome, rinse with
water. Wherever food contact is likely, rinse surface with water after cleaning.

GENERAL SHOWER CLEANING (:)

1. For best results, begin using product after your next shower or tub cleaning.
2. Every day, spray product on all wet surfaces, including the curtain or door, right after showering or bathing.
3. Daily use of product will keep your shower sparkling clean with no scrubbing or wiping. The more often you
use it, the better it works.

TO DISINFECT (:) Reapply, covering entire surface with foam. Allow foam to wet surface completely. Let stand 10
minutes. Then wipe.

TO PREVENT MOLD AND MILDEW GROWTH (:) On hard nonporous surfaces, spray surface thoroughly. Reapply
as new growth appears.

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Fungicide, and Rodenticide Act as
registered under No. 4822-505

PRECAUTIONARY STATEMENTS (:)

HAZARDS TO HUMANS AND DOMESTIC ANIMALS (:)

CAUTION: CAUSES MODERATE EYE IRRITATION. Harmful if absorbed through the skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

[Note to Reviewer: Boxed format and "bullets" as listed below will be used if label space permits; otherwise a paragraph format will be used.]

FIRST AID

If in eyes	<ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.
If on Skin or Clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • 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.	

PHYSICAL OR CHEMICAL HAZARDS(:)

CONTENTS UNDER PRESSURE. Do not use or store near heat or open flame. Exposure to temperatures above 130°F (54°C) may cause bursting. Do not puncture or incinerate container.

(STORAGE AND DISPOSAL) (:)

STORAGE: STORE OUT OF THE REACH OF CHILDREN.

DISPOSAL: This container may be recycled (in the (few) (but) (growing number of) (communities) where aerosol can recycling is available. Before offering for recycling, empty can by using the product according to the label. **DO NOT INCINERATE OR PUNCTURE.** If recycling is not available, replace cap and discard empty container in trash.

EPA Reg. No. 4822-605

EPA Est. No. 4822-WI-1(A), 71681-IL-1 (B), 71681-IL-2 (C), 11525-IL-1 (D), 10744-IL-1 (E), 68694-MN-1 (F), 42705-MN-2 (G)
Lot number suffix (A), (B), (C), (D), (E), (F), or (G) indicates appropriate establishment number

www.scrubbingbubbles.com

(S. C. Johnson) (A Family Company)

Questions? Comments?

Call 800-558-5252 or write

Helen Johnson (.)

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Racine, WI 53403-2238 U.S. A.

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Under the Federal Insecticide,
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amended, for the pesticide,
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Pictograms for 4822-505

