

4822-506

6-22-2001

1/12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

JUN 22 2001

ATTENTION: Sandra K. Baugh

SUBJECT: Tough Act Heavy Duty Aerosol Bathroom Cleaner
EPA Registration Number: 4822-506
Your Amendment Dated: March 26, 2001
EPA Received Date: March 27, 2001

The amendment referred to above, submitted in connection with registration under FIFRA as amended, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

A. The label for this product must list the complete name of the organism by genus and species which may be followed by the abbreviated name of the organism. The abbreviated name may not be listed separately from the complete name.

B. On page six of the submitted label in the Directions for use as a bathroom cleaner, revise the section "To Disinfect/Deodorize" as follows: "To Disinfect/Deodorize, *preclean as described above then* reapply, covering entire surface..."

C. As previously requested in the Agency letter of 12/8/99 delete all references which compare this product to those containing bleach. Delete the following phrases as they appear on pages 2, 4, and 5: "No chlorine or bleach fumes!" (three instances), "Bleach-free (formula)," and the phrase "or bleach" in the statement "Contains detergents, cleaners, chelants, water and no phosphates or bleach." following the ingredients statement.

CONCURRENCES

SYMBOL	7510C							
SURNAME	S. K. Baugh							
DATE	6/22/01							

D. Delete the phrases on pages 2 (3 instances) and 3 (two instances) which imply that this product may be used without wiping. These phrase are not in agreement with the directions for use which state: "Wipe with wet cloth or sponge." and "...let stand 10 minutes before wiping."

E. On page 4 delete the word "Safe" as it precedes the phrase "Will not harm septic systems." Also delete the entire phrase "Safe for septic systems."

F. Place the heading "Storage and Disposal" prior to the statements for "Storage" and "Disposal".

G. The following revisions must be made to your First Aid statement. Refer to PR Notice 2001-1 for additional details.

- "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.
 - Call a poison control center or doctor for treatment advice.
- If On Skin Or Clothing**
 - 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."

H. Delete the parenthesis as follows. On page 5 revise the statement "(For use on) (Cleans) (the following hard, non-porous surfaces)" to read "For use on (Cleans) the following hard, non-porous surfaces". On page 6 revise "Shake well before (and during) use(.)" to read "Shake well before and during use(.)" in the two instances where this phrase appears. Also revise the directions to clean the interior surfaces of the toilet bowl by stating "...leave...in bowl for at least 1 hour (or overnight) *then rinse by flushing.*"

I. On page 5 revise the first section to begin as follows: "Effective on *the following hard non-porous surfaces*: basins, chrome fixtures, glazed ceramic tile, glazed porcelain surfaces, showers, stainless steel..." as per the Agency letter of 12/8/99.

J. Please note that since data was not required in support of this submission, the submitted data matrix has not been reviewed.

CONCURRENCES							
SYMBOL							
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DATE							

The submitted Confidential Statements of Formula are addressed in a separate Agency letter dated June 22, 2001.

2. Submit two (2) copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

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 (7510C)

Enclosure (Stamped Label)
7510C:T.Lantz:6/15/01:4822-506e

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

4/12

TOUGH ACT® HEAVY DUTY AEROSOL BATHROOM CLEANER

S C Johnson
(A Family Company)

For Reviewer: Disinfecting/Antibacterial/Mold & Mildew Control Claims:

- Antibacterial
- Controls mold and mildew growth on hard, non-porous surfaces
- Disinfects and deodorizes!
- Disinfects for a deep down clean!
- (Effective:) Cleans (soap scum) (hard water) (and) (mineral) (stains) (!).
- Kills (gram-positive) common household germs[†]:
 - Staphylococcus aureus (Staph)
- Kills common household germs[†]:
 - Salmonella choleraesuis (Salmonella) (.)
 - Staphylococcus aureus (Staph) (.)
 - Pseudomonas aeruginosa (Pseudomonas) (.)
 - Streptococcus pyogenes (Strep) (.)
 - Aspergillus niger (mold and mildew) (.)
- Kills > 99.9% of common household germs[†]
- Kills > 99.9% of household germs[†]
- Kills greater than 99.9% of household germs[†]
- Kills greater than 99.9% of common household germs[†]
- Kills more than 99.9% of household germs[†]
- Kills more than 99.9% of common household germs[†]
- Kills household germs[†]
- Kills common household germs[†]

For reviewer: If we decide to use the following claim on the front panel:

Kills (>) (greater than) 99.9% of common household germs[†],

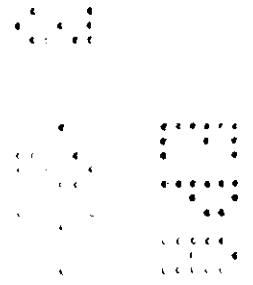
There will be a disclaimer on the back label panel that states:

- [†]Kills (>) (greater than) 99.9% of common household germs[†]:
 - Salmonella choleraesuis (Salmonella) (.)
 - Staphylococcus aureus (Staph) (.)
 - Pseudomonas aeruginosa (Pseudomonas) (.)
 - Streptococcus pyogenes (Strep) (.)
 - Aspergillus niger (mold and mildew) (.)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 22 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 4822-506



5/12

For Reviewer: Toilet Bowl Claims:

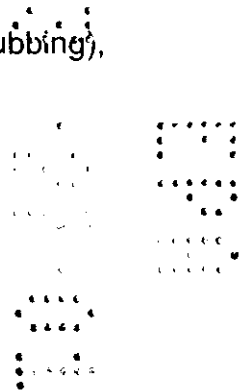
A quick spray a day keeps your bowl clean
 A spray a day keeps the brush away (!)
 Antibacterial exterior hard surface cleaner
 (Cleans) (and) (deodorizes) even up under the rim.
 Cleans, shines and deodorizes toilet bowl inside and out
 Combines quick acting foam cleaners to keep your bowl looking its best (.)(!)
 Deodorizes: For a deep down clean that leaves a brilliant shine and a fresh scent! No chlorine
 or bleach fumes!
 Disinfects exterior hard, non-porous surfaces of the bowl
 Disinfects the exterior surfaces of the bowl
 Disinfects exterior hard surfaces
 Disinfectant for exterior hard surfaces of the bowl
 Easy to use
 Easy to use and effective (!)
 Effective: Cleans hard water and mineral stains. Controls mold and mildew growth
 Eliminates the need to scrub your toilet bowl
 Even sprays upside down!
 For a deep down clean that leaves a brilliant shine and Fresh Scent!
 For best results (,) use daily!
 For best results, leave product on surface overnight.
 (For best results, start with a clean bowl!) (and use (this) product daily.)
 Helps keep your toilet bowl fresh and clean!
 Helps prevent unsightly mineral stains
 Just spray daily and walk away.(.)(!)
 Just spray and walk away!
 (Just) spray daily to keep your bowl clean
 (Just) spray daily to prevent buildup
 (Just) a spray a day keeps your bowl clean (!)
 (Just) a quick spray a day keeps your bowl clean.(.)(!)
 (Just) a quick spray a day keeps stains from building up.(.)(!)
 Leaves bowl sanitary
 No (brushing)/(scrubbing) (needed) (!)
 No brushing, no scrubbing, no wiping, no work!
 No chlorine or bleach fumes!
 No need to brush
 No scrubbing (wiping) (required) (needed) (after spraying) (.) (!)
 Now That's Clean!™
 Simply spray in bowl and walk away.
 Simply spray (daily) (and) (leave) (and walk away) (in bowl), (no brushing) (,) (no scrubbing),
 (no wiping)—(no work)(!)
 Spray daily to keep your bowl clean
 Spray...leave and walk away (!)(.)
 The daily (toilet) bowl cleaner (that eliminates the need to scrub your toilet bowl)(!)

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Tough Act® Heavy Duty Aerosol Bathroom Cleaner is the daily toilet bowl cleaner that virtually eliminates the need to scrub your toilet bowl. Simply apply product daily and leave in bowl.

Tough Act® Heavy Duty Aerosol Bathroom Cleaner is the daily (toilet) bowl cleaner that eliminates the need to scrub your toilet bowl. Simply spray in bowl and walk away. No brushing, no scrubbing, no wiping, no work!

Simply spray your bowl with **Tough Act® Heavy Duty Aerosol Bathroom Cleaner** daily to keep your toilet bowl clean and fresh. No brushing, no scrubbing, no wiping, no work.

Spray **Tough Act® Heavy Duty Aerosol Bathroom Cleaner** into the bowl and under the rim and let the foam attack the soils and stains.

Use **Tough Act® Heavy Duty Aerosol Bathroom Cleaner** once a day.

Tough Act® Heavy Duty Aerosol Bathroom Cleaner comes in an attractive container that can be left out for each use (every day).

Tough Act® Heavy Duty Aerosol Bathroom Cleaner is the daily bowl cleaner that eliminates the need to scrub your toilet bowl.

For Reviewer: Cleaning/Deodorizing Claims:

- (Cleans) (&) (Shines) (Disinfects) (Deodorizes) (without scratching) (no-scratch formula) (!)
- Cleans (&) (Shines) (without scratching) (no-scratch formula) (!)
- Deodorizes: For a deep down clean (that) (;) (,) leaves a (brilliant shine) and a fresh (clean) scent!
- Easily removes (soap scum), (hard water stains), (and) (dirt).
- Helps clean and deodorize. Leaves a fresh clean scent!
- Leaves a brilliant shine and a fresh, clean scent.
- Makes cleaning easier!
- Now that's clean(!)
- Self-Cleaning Action!
- No work!
- Cleans the interior of the bowl
- A cleaner for interior surfaces of the toilet bowl

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For Reviewer: Misc. Marketing Claims:

Cleans hard water and mineral stains
 For a deep down clean that leaves a brilliant shine and Fresh Scent!
 For all other surfaces, spot test in an inconspicuous area.
 For use in the following areas: homes, motels, hospitals.
 (Fresh) (Clean) (Lemon) scent!
 Improved Fragrance!
 Improved Scent!
 Leaves a (brilliant shine) (and) (a fresh) (clean) scent!
 Leaves a brilliant shine and a fresh, clean scent.
 Leaves the bathroom smelling fresh and clean
 New!
 New and Improved!
 New Fragrance!
 New Fresh Scent
 New Scent!
 New and Improved Fragrance!
 New and Improved Scent!
 Prevents mildew stains!
 Removes soap scum easily!
 Simple to use(!)
 Specially formulated to attack soap scum, hard water stains and dirt.
 Spring Fresh (Scent) (Fragrance)
 Won't scratch surfaces...leaves a brilliant shine!

We Work Hard So You Don't Have To(!)

Bleach-free (formula)
 No chlorine or bleach fumes!
 (Safe) Will not harm septic systems
 Safe for septic systems(!)
 No harsh chemical odor

Tough Act® Heavy Duty Aerosol Bathroom Cleaner (has Scrubbing Bubbles®), (whose) (has) foaming action (that) thoroughly cleans, shines, disinfects and deodorizes. No scrubbing required. For use in the following areas: homes, motels, hospitals. Will not harm septic systems.

Specially formulated to attach soap scum, hard water stains and dirt. Controls mold and mildew growth on hard, non-porous surfaces. Kills common household germs†:

- Salmonella choleraesuis (Salmonella) (.)
- Staphylococcus aureus (Staph) (.)
- Pseudomonas aeruginosa (Pseudomonas) (.)
- Streptococcus pyogenes (Strep) (.)
- Aspergillus niger (mold and mildew) (.)

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Effective on basins, chrome fixtures, fiberglass, glazed ceramic tile, glazed porcelain surfaces, hard, non-porous surfaces, showers, stainless steel, toilet bowl(s), toilet(s), tubs. For all other surfaces, spot test in an inconspicuous area. **Tough Act® Heavy Duty Aerosol Bathroom Cleaner** contains no abrasives, so it can't scratch surfaces. Leaves a brilliant shine and a fresh, clean scent.

(For use on) (Cleans) (the following hard, non-porous surfaces):

- basins
- chrome fixtures
- fiberglass
- glazed ceramic tile
- glazed porcelain surfaces.
- hard, non-porous surfaces
- showers
- stainless steel
- toilet bowl(s)
- toilet(s)
- tubs

Tough Act® Heavy Duty Aerosol Bathroom Cleaner contains no abrasives, so it can't scratch surfaces.

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) (Other) ingredients:	99.78%
..... (Contains detergents, cleaners, chelants, water,	
..... and no phosphates or bleach.)	
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION(:)

See back panel for additional precautionary statements.

NET WT. 4 OZ. – 30 OZ.

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9/12

To Reviewer: There are two sets of DIRECTIONS FOR USE -- a Bathroom Cleaner and a Toilet Bowl Cleaner.

(Directions for Use for a Bathroom Cleaner)

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 surfaces to be cleaned. Allow foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge, rinse with water.

TO DISINFECT/DEODORIZE, reapply, covering entire surface with foam. Allow foam to wet surface completely and let stand 10 minutes before wiping.

TO CONTROL MOLD AND MILDEW GROWTH on pre-cleaned, hard, non-porous surfaces, spray surface until thoroughly wet. Allow product to stand at least 10 minutes before wiping. Reapply as new growth appears.

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(Directions for Use for a Toilet Bowl Cleaner)

DIRECTIONS FOR USE(:)

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SHAKE WELL BEFORE (AND DURING) USE(.)

For best results, start with a clean bowl.

TO CLEAN THE INTERIOR SURFACES OF THE TOILET BOWL: Prior to using this product, clean the inside of the toilet bowl to remove heavy soil. To apply the product, turn can upside down. (Point arrow on spray button to mark on rim.) Spray 6-8 inches from bowl surfaces, thoroughly coating the interior surfaces, especially under the rim. Allow foam to penetrate dirt on interior bowl surfaces. No scrubbing required after spraying. For best results, leave **Tough Act® Heavy Duty Aerosol Bathroom Cleaner** in bowl for at least 1 hour (or overnight) (, then rinse by flushing).

TO CLEAN THE EXTERIOR SURFACES OF THE TOILET BOWL: (Point arrow on spray button to mark on rim.) Spray 6-8 inches from surfaces to be cleaned. Allow foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge.

TO DISINFECT/DEODORIZE THE EXTERIOR SURFACES OF THE TOILET BOWL: (Point arrow on spray button to mark on rim.) Spray 6-8 inches from exterior surfaces of the toilet bowl. Allow foam to wet surface completely and let stand 10 minutes before wiping.

10/12

**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.

FIRST AID: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. **IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

PHYSICAL OR CHEMICAL HAZARDS: Contents under pressure. Do not use or store near heat or open flames. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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.

Contains 6% hydrocarbon propellant.

Will not harm plumbing or septic systems.

EPA Reg. No. 4822-506
(EPA Est. No. 4822-WI-1) (EPA Est. No. 71681-IL-2)

Visit us at www.vanish.com

Questions? Comments?
Recycling Information?
Call 800-558-5252 or write Helen Johnson.
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Racine, WI 53403-2236 U.S.A.
All rights reserved.
(Patent) (Pat.) Pending

S C Johnson
(A Family Company)

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11/12

PICTOGRAMS FOR LABEL

WORKS FROM ANY ANGLE!

TOILET BOWL PICTOGRAM

NO BRUSHING/NO SCRUBBING PICTOGRAM

STEEL RECYCLE SYMBOL

*CFC'S SYMBOL

Federal regulations prohibit CFC propellants in aerosols.



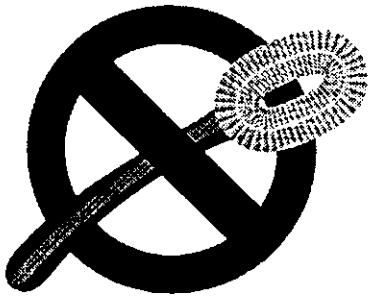
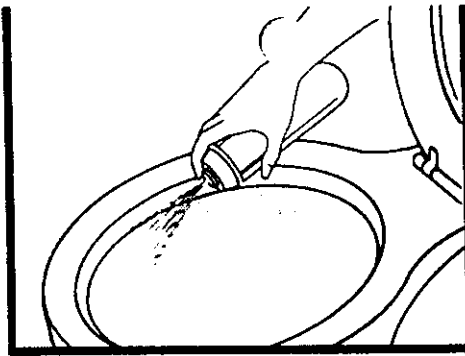
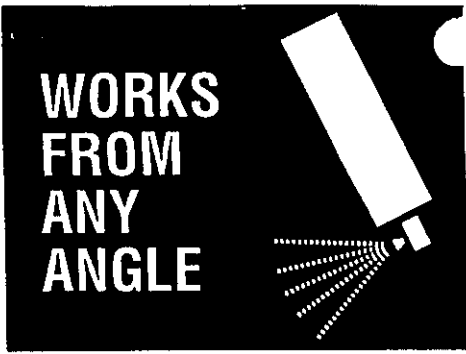
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12/12



Federal
Regulations
Prohibit CFC
Propellants
in aerosols

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