

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 26 2002

Sandra K. Baugh
Registration Specialist
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Subject: Amendment per FIFRA
Tough Act Heavy Duty Aerosol Bathroom Cleaner
EPA Registration No. 4822-506
Application Dated: January 29, 2002

Dear Ms. Sandra Baugh:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable.

- Minor Formulation Amendment submitting 6 alternate Confidential Statements of Formula
- Label Amendment to update the First Amendment Statements per PR Notice 2001-1

General Comments

A stamped copy of the label is enclosed for your records. You must submit a final printed label before you release this product for shipment.

Should you have any questions regarding this letter please contact me at 703-308-6233.

Sincerely,
Veima Noble

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

Encl: Product Chemistry data evaluation

CONCURRENCES

SYMBOL						
1510C						

TOUGH ACT® HEAVY DUTY AEROSOL BATHROOM CLEANER

S C Johnson
(A Family Company)

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

Antibacterial
Cleans & Shines
Cleans, Shines, Disinfects
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) (!).

For Reviewer: When the use of germs is used, it is always followed by the dagger or cross character and is relative to only those germs, bacteria and fungi listed below and that data is on file at EPA in support of them. The full organism names will always be followed by the abbreviated names in parenthesis for better understanding by the consumer:

Germs[†]:

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

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[†]

ACCEPTED
with COMMENTS
in EPA Letter Dated:

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

- 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)

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) (.)

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!
 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 work!
 No need to brush
 No scrubbing (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 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 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 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 and Deodorizes
- Cleans, Shines, Disinfects, Deodorizes
- (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 hard, non-porous 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! (**For Reviewer: The term new is allowed on the label for 6 months**)
- 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(!)
- Will not harm 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) (.)

Effective on the following hard non-porous surfaces: basins, chrome fixtures, fiberglass, glazed ceramic tile, glazed porcelain surfaces, showers, stainless steel, toilet bowl(s), toilet(s), tubs. For all other hard non-porous 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)	
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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Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the purpose of being registered under FIFRA Reg. No

4822-506

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 (AND DEODORIZE), (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 (AND DEODORIZE), preclean as described above, then 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.

(Directions for Use for a Toilet Bowl 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(.

For best results, start with a clean bowl.

TO CLEAN (AND DEODORIZE) 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 (AND DEODORIZE) 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 (AND 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.

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registered under EPA Reg. No **4822-506**

**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.

[For 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 & 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.

Contains 6% hydrocarbon propellant.

Will not harm plumbing or septic systems.

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

Visit us at www.vanish.com

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

©(2002) (2003) (2004) (2005) (2006)
S. C. Johnson & Son, Inc.
Racine, WI 53403-2236 U.S.A.

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(Patent) (Pat.) Pending

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PICTOGRAMS FOR LABEL

WORKS FROM ANY ANGLE!

PRODUCT BEING SPRAYED INTO TOILET BOWL

NO BRUSHING / NO SCRUBBING PICTOGRAM

STEEL RECYCLE SYMBOL

*CFC'S SYMBOL

Federal regulations
prohibit CFC
propellants
in aerosols.

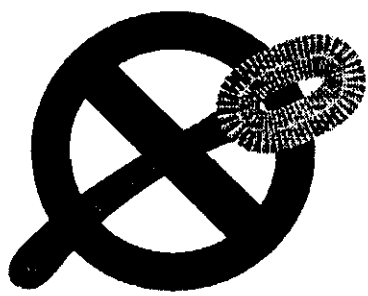
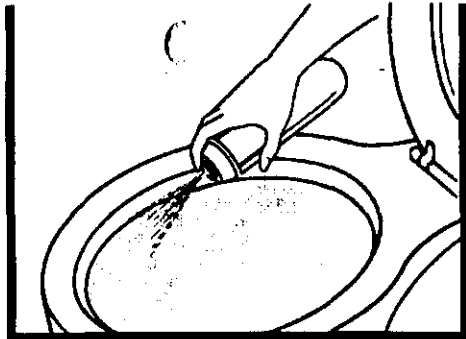
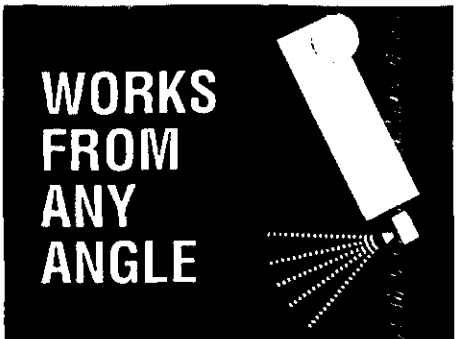
ACTUAL TOILET BOWL PICTOGRAM

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