

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

JUL 16 2002

Subject: Amendment per FIFRA
Dow Liquid Bathroom Cleaner
EPA Registration No. 4822-507
Application Dated: April 15, 2002
EPA Received Date: April 17, 2002

Dear Ms. Baugh:

The following amendment, submitted in connection with registration under 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with comments.

Proposed Amendment

- Minor formulation change for 5 Alternate Confidential Statements of Formula
- Update First Aid Statements per PR Notice 2001-1

Product Chemistry

1. All the fragrances added to the Basic Formula to create five new Alternate Formulations have previously been approved for use in pesticides.
2. The certified upper and lower limits of all the ingredients are within the standard range of limits listed in 40 CFR, Part 158.175.
3. The nominal concentrations of the two chemicals which make up the active ingredient listed on the Confidential Statement of Formula are the same as those listed in the label ingredient claims statement, conforming to PR Notice 91-2.
4. This product has been owned previously by at least one other company, and ownership has been transferred to S.C. Johnson & Son Inc. The label enclosed in this submission has been re-designed and simplified from the last previously accepted label. May of the organisms for which label claims of effectiveness were made have been removed from the label. The names of two fungal organisms, associated with athlete's foot and mold and mildew problems have

SYMBOL	7510C						
SURNAME	S.K. Baugh						
DATE	7-15-02						

been omitted on this label. To support the claims made for the effectiveness of the product to control these problems, those specific names must appear on the label. Efficacy testing for these two organisms has been done previously, and the Agency has those results on file to confirm the effectiveness of the product against these organisms. The registrant is aware of the discrepancy on this draft label.

Label Comments

1. On page 1, delete the claim "New and Improved" from the product label. This claim was acceptable per Agency letter, dated August 6, 1998, with the condition that this text remain on the label for six months.
2. On page 3, revise the use sites "porcelain", "porcelain surfaces", and "tile" to read "*glazed* porcelain", "*glazed* porcelain surfaces", and "*glazed* tile", respectively.
3. Revise the phrase "For all other surfaces," to read "For all other *hard, non-porous* surfaces."
4. On page 3, revise the claims "We kill odor-causing germs..." and "Kills odor-causing germs..." to read "We kill odor-causing *bacteria*..." and "Kills odor-causing *bacteria*...", respectively.
5. Since this product only support claims against bacteria and fungi, 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 household germs" to state "Kills common household bacteria..."
6. Since your label includes hospitals and lists unqualified surfaces like chrome, and stainless steel, the MOU from PR Notice 94-4 is required on your label. Therefore, you must revise the Directions for Use section to include the following statement:
This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.
7. 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."

8. Since this product is used as a fungicidal, revise the Directions for Use section to include the following directions:
TO INHIBIT FUNGUS: Fungicidal against *Trichophyton mentagrophytes* (the athlete's foot fungus) in areas such as locker rooms, dressing rooms, shower and bath areas and exercise facilities.
9. 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.
10. Revise the Precautionary Statements to read:
CAUTION. Keep out of Reach of Children. 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.
11. Revise the First Aid Statements to include:
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.
12. Resubmit five(5) copies of the label incorporating the changes above.

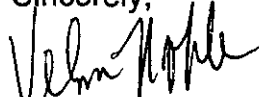
General Comments

The registrant must add the specific organism *Trichophyton mentagrophytes* to the words of the label claims on page 3 which state "athlete's foot fungus." The specific organism *Aspergillus niger* must be added to the claim on the same page which states in two places "removes mold and mildew stains and odors."

The Confidential Statements of Formula for Alternate Formulations 29575 A, 29622 A, 29679 A, 29720 B, and 29726 A, dated April 10, 2002, are acceptable.

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

Sincerely,



Velma Noble

Product Manager 31

Regulatory Management Branch I
Antimicrobials Division (7510 C)

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DOW LIQUID BATHROOM CLEANER

ANTIBACTERIAL
 CLEANS & DEODORIZES
 CLEANS & SHINES WITHOUT SCRATCHING!
 CLEANS, SHINES, DISINFECTS & DEODORIZES!
 DISINFECTS AND DEODORIZES!
 FOAMS AND CLINGS TO TOUGH SOAP SCUM
 FOR EXPORT ONLY
 FRESH CLEAN SCENT
 INSTITUTIONAL
 KILLS COMMON HOUSEHOLD GERMS†
 NEW!
 NEW AND IMPROVED
 NOT FOR RETAIL SALE (To be used only by Institutional/Commercial Supplemental Registrant)
 REMOVES SOAP SCUM EASILY!
 TOUGH ON DIRT AND SOAP SCUM
 SCJ HAS A CLEANING SOLUTION FOR EVERY ROOM IN YOUR HOME
 WE WORK HARD SO YOU DON'T HAVE TO!®
 WON'T SCRATCH FIBERGLASS!

- Country fresh scent
- Country meadow scent
- Crystal fresh scent
- Fresh clean citrus scent
- Fresh clean lemon scent (!)
- Fresh clean scent!
- Fresh floral scent
- Fresh meadow scent
- Garden Bloom (Scent)
- Light fresh scent
- Morning fresh scent
- Mountain mist scent
- Mountain Spring (Scent)
- Natural Spring (s) (Scent)
- Ocean Breeze (Scent)
- Ocean Mist (Scent)
- Rainshower Clean (Scent)
- Spring Fresh (Scent)
- Spring Mist (Scent)
- Spring Zest (Scent)
- Spring Blossom (Scent)
- Spring breeze scent
- Springtime fresh scent
- Springtime breeze scent
- Summer breeze scent
- Tender Breeze (Scent)
- Tropical Rain (Scent)
- Waterfall Mist (Scent)

ACCEPTED
 with **COMMENTS**
 in EPA Letter Dated:

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Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No. 4822-507

- (Glade®) Rainshower scent
- (Glade®) Ocean breeze scent
- (Glade®) Natural spring scent
- (Glade®) Tender breeze scent
- (Glade®) Neutralizer
- (Glade®) Refreshing citrus 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 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!
- 22.1 oz. at the 17 oz. Price

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

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Active ingredients:

n-Alkyl (60% C₁₄, 30% C₁₆, 5% C₁₂, 5% C₁₈) dimethyl benzyl ammonium chlorides0.11%
n-Alkyl (68% C₁₂, 32% C₁₄) dimethyl ethylbenzyl ammonium chlorides0.11%

Inert ingredients: (Includes detergents and cleaners).....99.78%

Contains no phosphates.

KEEP OUT OF REACH OF CHILDREN

CAUTION:

See back panel for additional precautionary statements.

- NET 17 FL. OZ. (1 PT. 1 FL. OZ.) 502 mL
- NET 22 FL. OZ. (1 PT. 6 FL. OZ.) 650 mL
- NET 22.1 FL. OZ. (1 PT. 6.1 FL. OZ.) 653 mL
- NET 32 FL. OZ. (1 QT.) 946 mL
- NET 1 Gallon (3.78L)

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

Dow Liquid Bathroom Cleaner gives you Scrubbing Bubbles®, whose foaming action thoroughly cleans, shines, disinfects, and deodorizes with a fresh, clean scent for you. No scrubbing required!

- Easily removes soap scum, hard water stains, and dirt
- Kills common household germs†: *Staphylococcus aureus* (staph), *Streptococcus pyogenes* (Strep) and athlete's foot fungus.
- Disinfects and kills common household germs†: *Staphylococcus aureus* (Staph), *Streptococcus pyogenes* (strep) and athlete's foot fungus on household surfaces.
- Removes mold and mildew stains and odors
- Leaves a brilliant shine and a fresh, clean scent
- Controls mold & mildew growth
- Won't scratch surfaces...leaves a brilliant shine!

(Effectively cleans) (Effective on:) bathroom fixtures, tubs, showers, shower walls, shower doors, basins, ceramic tile, stainless steel, chrome, chrome fixtures, fiberglass, counter tops, baked enamel, porcelain, porcelain surfaces and synthetic marble. (For all other surfaces) Spot test in an inconspicuous area. (Spot test for all other surfaces;) not recommended for use on acrylic, brass or marble. Recommended use areas: homes, motels, hospitals. Specially formulated to attack soap scum, hard water stains and dirt. **Contains no abrasives, so it can't scratch surfaces.**

Or

Dow Liquid Bathroom Cleaner thoroughly cleans, shines, disinfects, and deodorizes. Specially formulated to attack soap scum, hard water stains and dirt. **Controls mold & mildew growth on hard, nonporous surfaces. Kills common household germs†: *Staphylococcus aureus* (Staph), *Streptococcus pyogenes* (Strep) and athlete's foot fungus on household surfaces.** Effective on bathroom fixtures, tubs, showers, shower walls, shower doors, basins, ceramic tile, stainless steel, chrome, chrome fixtures, fiberglass, counter tops, baked enamel, porcelain, porcelain surfaces and synthetic marble. (For all other surfaces), spot test in an inconspicuous area. (Spot test for all other surfaces;) not recommended for use on acrylic, brass or marble. Recommended use areas: homes, motels, hospitals. Contains no abrasives, so it can't scratch surfaces.

Or

Cleans and shines...bathroom fixtures, tile, chrome, chrome fixtures, fiberglass, baked enamel, porcelain, stainless steel, (and) synthetic marble. For all other surfaces, spot test in an inconspicuous area. Recommended use areas: motels, hospitals, (and) homes.

"We kill odor-causing germs, and smell nice too!" Kills odor-causing germs, *Staphylococcus aureus* (Staph),¹ and Athlete's foot fungus. Removes mold and mildew stains and odors.

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TO SPRAY: Rotate trigger nozzle to "ON" position.

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

TO USE, lift flap and lock into arrow on top of trigger foamer. Do not operate when flap is closed. (To use trigger spray foamer, turn to ON position.) (Do not operate when OFF is in top position.)

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. (Use this product to refill a labeled (32 oz.) Dow Liquid Bathroom Cleaner bottle.) **TO CLEAN:** Hold 6-8 inches from surface to be cleaned. Spray with quick, full strokes. Allow foam to penetrate dirt and soap scum. Wipe with wet cloth or sponge. No need to wipe dry. On chrome, rinse with water.

TO DISINFECT: Reapply, covering entire surface with foam. Allow foam to wet surface completely, let stand 10 minutes before wiping.

TO INHIBIT MOLD AND MILDEW GROWTH: On hard, nonporous surfaces, spray surface thoroughly, let stand 10 minutes before wiping. Reapply as new growth appears.

PRECAUTIONARY STATEMENTS(:)

HAZARDS TO HUMANS AND DOMESTIC ANIMALS(:)(:)

CAUTION (:): DO NOT SPRAY IN FACE OR EYES.

[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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

STORAGE AND DISPOSAL (:)

Store out of the reach of children. Do not reuse empty container. Rinse thoroughly with water and discard in trash.

EPA Reg. No. 4822-507. EPA Est. No. 4822-WI-1 (A), 63171-SC-1 (B), 54487-GA-1 (C)
Lot number suffix A, B or C indicates appropriate establishment number.

Questions? Comments?

Call TOLL-FREE

1-800-558-5252

or write Helen Johnson.

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1525 Howe Street

Racine, WI 53403-2236 U.S.A.

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Made in U.S.A.

www.scrubbingbubbles.com

Bottle made of 25% post-consumer recycled (material) (plastic).

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