

4822-539

4/27/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 27, 2005

W.A. Hawkins Jr., Ph.D.
Registration Specialist II
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Subject: **Oscar**
EPA Registration No.4822-539
Application Date: December 7, 2004
Receipt Date: December 12, 2004

Dear Dr. Hawkins:

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

Proposed Label Amendment

- Label amendment to add biofilm claims on hard non-porous surfaces
- Revised use directions

Conditions:

The submitted efficacy data support the use of this product to remove biofilm on surfaces which do not undergo routine shear stress (static biofilms). The surfaces supported by the static biofilm efficacy data are the ones listed on the label except for the surfaces listed in 1(b) below. The following MRID #s were assigned to the submitted efficacy data:

MRID 464271-01
MRID 464271-02
MRID 464271-03

1. Data are required to confirm that this product is efficacious in controlling biofilm on surfaces that routinely undergo fluid stress. Consequently, the following are required.

a) A protocol which would be used to develop efficacy data to demonstrate biofilm control using a drip flow reactor must be submitted to the Agency for approval within 12 months from the date of this letter.

b) Efficacy data must be submitted within 7 months following notification of Agency approval of the above protocol. The efficacy data must be found acceptable or the following surfaces must be removed from the label:

Basins
Bathroom sink
Fiberglass tubs, shower surrounds, and sinks
Plastic and vinyl shower doors
Shower doors
Shower fixtures
Shower walls
Showers
Sinks
Urinals

2. Labeling Comments: The following label changes must be made before you release this product for shipment bearing the biofilm claims:

a) Use of the phrase "biofilm sanitizer" is not acceptable. The term "sanitizer" must be replaced with another term. A suggested phrase is "controls biofilm".

b) The Agency has traditionally limited use of the term "slime" on pesticide labeling to non-public products. For public health products, the Agency prefers that the term "biofilm" be used since efficacy data are required to support this claim for certain use sites. Therefore to preserve this distinction, anywhere on this label the term "slime" is used it must also be associated with the term "biofilm".

c) On page 2 of the proposed label remove the term "(1st) (first)" from all of the claims listed on the label.

d) On page 1 of the proposed label the claim "slows down biofilm build up" must be removed. This claim implies prevention and inhibition of biofilms and has not been tested or proven.

e) On page 1 of the proposed label, change "Seeks and Destroys bacteria and the slime they form" to read "Destroys bacteria and the slime they form". The term "seeks" implies that the agent itself can locate and search for bacteria, this claim has not been tested.

f) On page 2 of the proposed label, eliminate the phrase "Kills bacteria deep down in the biofilms (,) (not just the top layer)." This claim has not been proven; no microscopy has been done to show that several layers of extracellular polymeric substance (EPS) exist, and that the product penetrates through many of them.

g) A clear distinction must be made with the layout and wording of the final label between biofilm sanitization, and surface sanitization of unattached organisms. The contact times for each, 5 minutes and 1 minute respectively, are not to be confused.

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General Comments

A stamped copy of the accepted labeling is enclosed.

If the above conditions listed in this amended registration acceptance are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

If you have any questions concerning this letter, please contact me at (703) 308-6422 or Renae Whitaker at (703) 308-7003.

Sincerely,



Mark Hartman
Acting Branch Chief
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

4 8 13

OSCAR

A Bathroom Cleaner, Sanitizer (Biofilm Sanitizer) and Mildewstat

Removes Soap Scum (and)
Kills 99.9% of bacteria* (in 1 minute)

Active Ingredient: L-Lactic Acid	2.0%
Other Ingredients:	<u>98.0%</u>
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION: See additional precautions on back panel.

Biofilm Claims:

- Scrubbing Bubbles (Max) (Soap Scum Remover) (Bathroom Cleaner) (with) (Bio-Remover™):
- Cleans biofilm away
- Cleans away bacterial grunge or slime
- Cleans bacterial grunge in biofilm
- Cleans so thoroughly it slows down biofilm build up (kills bacteria that form slime)
- Cuts through the grungy biofilm buildup to kill bacteria where they live and hide
- Cuts through the slime that can harbor bacteria
- (Seeks and) Destroys bacteria and the slime they form
- Gets to the source of the bacteria layers lurking in your home and wipes it out
- (Formulated to) (Clean)(s) (soap scum) (and) (Kill)(s) (Eliminate)(s) (Reduce)(s) (Remove)(s)
- (Destroy)(s) (Attack)(s) (99.999% of) (99.9% of) (in 5 minutes) (the)
- bacteria in (slimy) biofilm
- bacteria in slimy buildup
- bacteria living in (slime) (called) biofilm
- bacteria growing in biofilm
- bacteria living and growing in biofilm
- bacteria protected by biofilm
- bacteria protected by slimy buildup
- bacteria in organic slime
- bacteria under the slime
- bacteria within the slime
- bacteria where they hide – in biofilm
- bacteria hidden in soap scum
- bacteria under the soap scum

ACCEPTED
with COMMENTS
EPA Letter Dated:

APR 27 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
authorized by the Administrator,
registered under FIFRA Reg. No. 4822-539

- bacteria in (the) grungy buildup
- greater than 99.999% of bacteria in biofilm
- protected bacteria living in biofilm
- surface associated bacteria
- 99.999% of surface associated bacteria
- household surface associated bacteria
- Eliminates slimy buildup
- Kills bacteria deep down in biofilms (,) (not just the top layer)
- Kills bacteria where they hide (!)
- Kills the bacteria under the buildup even before you see it (in your home)
- Loosens up the slime that can harbor bacteria
- Penetrates biofilm and wipes out bacteria (!)
- Penetrates biofilm, killing the bacteria living there
- Penetrates deep into biofilm to kill bacteria embedded in it
- Penetrates the biofilm and kills bacteria (!)
- Penetrates the bacterial layers for a deep down clean
- Penetrates the grungy biofilm buildup to kill bacteria living there
- Penetrates the (slime) (film) and kills bacteria (!)
- Penetrates the slime that can harbor bacteria
- Penetrates slime and kills bacteria where they hide (- in biofilm)
- Proven to penetrate the invisible biofilm layer on your bathroom surfaces
- Reaches and kills 99.999% of embedded bacteria in biofilm
- Slows down biofilm buildup
- Specifically (designed) (formulated) to destroy bacteria in biofilm

- The (1st) (first) bathroom cleaner that kills bacteria in biofilm
- The (1st) (first) bathroom cleaner approved to kill bacteria in biofilm
- The (1st) (first) bathroom cleaner (with) (that has) Bio-Remover™
- The (1st) (first) bathroom cleaner that penetrates biofilm to kill bacteria
- The (1st) (first) bathroom cleaner with biofilm claims
- The (1st) (first) bathroom cleaner that kills the tough bacteria in biofilm
- The (1st) (first) bathroom cleaner that penetrates the slimy biofilm and kills the bacteria where they hide
- The (1st) (first) bathroom cleaner that penetrates the slimy, glue-like biofilm to kill (even) the toughest bacteria
- The (1st) (first) bathroom cleaner that kills the slimy bacteria
- The (1st) (first) bathroom biofilm penetrator

*No
Grip
Dermis*

Packaging Claims:

- Big (job) size
- Bigger size (package) (bottle)
- Economy size
- (New) (Improved) (fragrance) (scent) (!)
- (New!)
- (New) (Comfort) (Easy Grip) (Ergo) (Improved) (Trigger)

(New) (ergonomic) (user-friendly) trigger makes (this product) even easier to use!
 (New) (Big) 32 oz. (Size)
 (Two) (2) Liter (Size) (!)
 Trial size (Available)
 Value (Pack) (Size)
 (X) (free) (more) (!)
 (X) at the (X oz.) price (!)

Miscellaneous Statements/Claims:

Bottle made of XX% post-consumer recycled plastic
 Contains no abrasives, harsh acids or bleach
 Contains no (Chlorine) (,) (or) (Bleach) (,) (or) phosphates
 For old or worn surfaces, test on a small area before use
 Will not harm septic (systems) (tanks)

Fragrance/Scent Violators:

(Citrus) (Citrus Action) (Citrus Blast) (Citrus Blend) (Citrus Boom) (Citrus Energy) (Citrus Explosion) (Citrus Extreme) (Citrus Power) (Citrus Splash) (Citrus Surge) (Citrus Twist) (Citrus Ultra) (Citrus Zest) (Clean) (Fresh) (Light) (Lemon) (Lemon Zest) (Refreshing) (Unscented) (Orange) (Orange Action™) (Orange Twist) (Floral) (Grapefruit) (Scent) (!)

Marketing Claims:

1 minute sanitization
 A (new) tough cleaning formula
 An effective sanitizer for use in the bathroom
 Antibacterial bathroom cleaner
 Antibacterial Action
 Antibacterial Formula (cleans and sanitizes)
 Bathroom (restroom) cleaner and sanitizer
 Bleach-free
 Cleans (and) (sanitizes) (deodorizes)
 Cleans and sanitizes (without harsh fumes)
 Cleans and shines without scratching
 (Cleans) (removes) (tough) soap scum(!)
 Cleans: Penetrating foam powerfully removes tough soap scum and grime (!)
 Cleans Soap Scum without scrubbing
 Cleans without scrubbing
 Complete clean (!)
 Cuts soap scum, hard water stains and shines bathroom surfaces
 Cuts through tough soap scum
 Deep penetrating antibacterial formula
 Deodorizes
 Dissolves tough soap scum on contact

Does not contain bleach

Easily cleans tough (bathroom) (restroom) (dirt) (soil) (soap scum) (hard water) (stains) and sanitizes

Easily cleans tough greasy dirt and sanitizes

Easily cleans tough greasy (dirt) (grime) (fingerprints) and sanitizes

Easily removes soap scum (hard water stains) (and) (dirt)

Easy to use

Effective sanitizing has never been easier

Effectively cleans tubs, showers, basins, ceramic tile, stainless steel, chrome, fiberglass, vinyl and porcelain surfaces.

Eliminates odors

Fast, easy cleaning solution – one product for a variety of surfaces

For daily use

For everyday cleaning

For general (cleaning and) sanitizing of hard non-porous surfaces

For use on household surfaces

Freshens: (Orange Action™) (fragrance) deodorizes and leaves your bathroom smelling fresh!

Great for use in your bathroom

Great on surfaces such as: (See List of Surfaces)

Guaranteed to clean or your money back (see back panel)

Heavy duty cleaner

Helps fight bacteria

Helps prevent cross-contamination of hard non-porous surfaces

Helps prevent (Reduces) cross contamination from treated surfaces.

Helps prevent bad (odors) (malodors) by cleaning, sanitizing and deodorizing the following surfaces: (See List of Surfaces)

Household bacteria killing formula

For (tough) (tougher) cleaning (!)

Inhibits mold and mildew in damp and musty places

Kills (99.9%) of bacteria* in 1 minute

Kills (99.9% of) household bacteria* in 1 minute

Kills household bathroom bacteria

Kills (removes) (99.9%) of *Escherichia coli* (and) *Staphylococcus aureus* and *Klebsiella pneumoniae*

Kills 99.9% of bacteria* in 1 minute

Kills 99.9% of Staph (*Staphylococcus aureus*) and *Klebsiella pneumoniae* in 1 minute

Kills bacteria* in (just) 1 minute

Kills bacteria that cause odors

Kills bacteria* (found) on hard non-porous (bathroom) surfaces

Kills common household bacteria*

Leaves (bathrooms) (your bathroom) clean and (shiny) (shining)

Leaves a brilliant shine (!)

Leaves a brilliant shine and a fresh, clean scent

Leaves hard, non-porous surfaces sanitized

Leaves your bathroom clean and fresh

Makes cleaning easy and sanitizes too

Makes killing bacteria easy

Multi-surface (cleaner)

(New) Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) removes (tough) soap scum and bathroom grime (more powerfully) (more easily) than ever before!

No (visible) (smeary) (oily) residue (build up)

No harsh fumes

No-scratch formula

Now cleaning and killing bacteria is easier than ever before

(Now) The cleaning power of Scrubbing Bubbles (comes) with the invigorating scent of fresh (oranges)!

One-step cleaning and sanitizing

(Orange Action™) fragrance deodorizes and leaves your bathroom smelling fresh!

Penetrating foam thoroughly cleans and leaves behind a (brilliant) shine!

Powerful formula cleans and sanitizes

Perfect for cleaning up around the toilet

Powerfully removes tough soap scum (!)

Prevents the growth of mold & mildew**

Effectively removes bacteria*

Ready to use, convenient; the easy way to clean and sanitize toilet seats, toilet exteriors, and other non-porous surfaces

(Removes) (Gets rid of) soap scum (hard water stains)

Removes (hard water stains) (soap scum) (sanitizes), (deodorizes)

Removes Soap Scum

Removes tough soap scum easily (!)

Sanitizes (kills) common household bacteria* (and prevents the growth of fungi** (and) (or) mold)

Sanitizes (household) bathroom surfaces in 1 minute

Sanitizes and deodorizes

Sanitizes as it cleans

Sanitizes hard non-porous bathroom surfaces

Sanitizes in just (1) minute

S.C. Johnson has a cleaning solution for every room in your home

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) cleans and sanitizes the following surfaces: **(See List of Surfaces)**

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) is the convenient way to (clean) (and) (sanitize) bathroom surfaces

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) is the easy way to clean and sanitize

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) is the effective way to clean and sanitize

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) kills many types of (household) bacteria* (and eliminates their odors)

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) kills the following bacteria: *Staphylococcus aureus* (Staph) (ATCC #6538), *Klebsiella pneumoniae* (ATCC #4352), *Escherichia coli* (E. coli) (ATCC #11229)

Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) thoroughly cleans (shines) (and) (sanitizes) (deodorizes).
 Specially formulated to attack (tough) soap scum, hard water stains and dirt
 Shines: Leaves behind a brilliant shine (!)
 Shines (and) (plus) kills household bacteria*
 Specially formulated for a variety of surfaces
 Specially formulated for use daily (to clean bathroom soils such as soap, soap scum, toothpaste, hair spray, hair gel, cosmetics, shaving cream and hand and body lotion)
 Specially formulated for use in the bathroom
 Specially formulated to attack (tough) soap scum, hard water stains and dirt
 Starts killing bacteria on contact
 Such tough cleaning that it leaves no visible residue behind (!)
 The easiest way to keep your bathroom clean everyday
 The easy way to clean and sanitize
 The (easy) (effective) way to clean and sanitize
 This product is a mildewstat and will effectively inhibit the growth of mildew on hard non-porous surfaces
 The smart way to (kill) (remove) bacteria
 Tough cleaning formula (with a fresh scent)
 Tough cleaning never smelled so good
 Tough cleaning without the oily (smeary) residue (!)
 Tough on dirt and bacteria*... Easy on You!
 Tough on dirt... Easy on you!
 Tough on soap scum
 Use in the bathroom
 Use Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) to sanitize the following surfaces: (See List of Surfaces)
 Use throughout the bathroom
 Versatile cleaner for all of your bathroom surfaces
 Versatile cleaner that can be used throughout the bathroom
 We work hard so you don't have to![®]
 When used as directed, Scrubbing Bubbles (Soap Scum Remover) (Bathroom Cleaner) (Max) (with) (Bio-Remover™) prevents build-up of soap scum
 Will not harm most surfaces
 With a bleach-free formula
 With a pleasant fragrance
 Won't scratch surfaces
 Works (best) on soap scum (!)
 Works in 1 minute to kill 99.9% of (household) bacteria*

**Staphylococcus aureus* (Staph) (ATCC #6538), *Klebsiella pneumoniae* (ATCC #4352), *Escherichia coli* (E. coli) (ATCC #11229)

***Aspergillus niger* (ATCC #6275)

Surfaces:

Works on multiple surfaces
 (Recommended for use on) (Effective on) (Effectively Cleans) (Cleans) (Sanitizes) (and)
 (Deodorizes) (hard, non-porous) bathroom surfaces (such as):

Non-wood finished cabinets
 Basins
 Bathroom sink
 Chrome
 Counter tops
 Diaper changing counters
 Diaper pails
 Doorknobs
 Enamel
 Faucets
 (Fiberglass tubs, shower surrounds and sinks)
 Floors
 Formica®
 Garbage cans
 Glazed porcelain
 Glazed ceramic tile
 Hand rails
 Light switches
 Plastic
 Plastic and vinyl shower doors
 Shower doors
 Shower fixtures
 Shower walls
 Showers
 Sinks
 Stainless steel
 Synthetic marble
 Toilet seats and exterior toilet surfaces
 Exterior toilet surfaces
 Trash cans
 Tubs
 Urinals
 Vanity tops
 Vinyl
 Walls

Will not harm most surfaces

Not recommended for use on natural marble, brass, or varnished wood

Spot test all other surfaces

For old or worn surfaces, test on a small area before use

Test on painted areas before using

Will not scratch (bathroom surfaces)!

- in
- Apartments
- Bathrooms
- Day care centers
- Homes
- Hotels
- Malls
- Motels
- Nursing homes
- Public restrooms
- Residences
- Restrooms
- Schools
- Veterinary offices

Soils:

(Specially formulated to remove) (Effective at removing) (Effective for cleaning) (Use to clean) (Removes) (bathroom soils) (such as):
 Bath gel, Body lotion, Body wash, Conditioner, Cosmetics, Dirt, Fingerprints, Grime, Hair gel, Hair spray, Hand lotion, Hard water stains, Shampoo, Shaving cream, Shower gel, Soap, Soap scum, Toothpaste

DIRECTIONS FOR USE

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

TO CLEAN:

1. Turn nozzle to ON position.
2. Spray 6-8 inches from surface. Cover all surfaces evenly. Allow foam to penetrate dirt and soap scum (for tough jobs, let stand for several minutes before wiping).
3. Wipe with a wet cloth or sponge, then rinse thoroughly with water.

TO KILL 99.9% OF BACTERIA ON HARD NON-POROUS SURFACES: Spray surface until thoroughly wet. Let stand for 1 minute. Then wipe. For heavily soiled areas a pre-cleaning is required.

TO SANITIZE (KILL (99.999% of) BACTERIA IN BIOFILMS ON HARD, NON-POROUS SURFACES: Spray surface until thoroughly wet. Let stand for 5 minutes. Then wipe. Repeat treatment as needed for heavy soil / heavy buildups.

TO INHIBIT AND PREVENT THE GROWTH OF MOLD & MILDEW ON HARD NON-POROUS SURFACES: Spray surface until thoroughly wet. Let stand for 5 minutes. Then wipe. Reapply as necessary.

Good ventilation during use is recommended.

Never use or mix with bleach-containing products as hazardous fumes may be released.

Unplug small electrical appliances before (use) (cleaning) (sanitizing) (them) with this product.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

FIRST AID: 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. Call a poison control center or doctor for treatment advice.

(STORAGE & DISPOSAL:)

STORAGE: Store out of reach of children. **DISPOSAL:** Do not reuse container, discard in trash.

EPA Reg. No. 4822-539

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

Questions? Comments? Call 800-558-5252 or Write Helen Johnson

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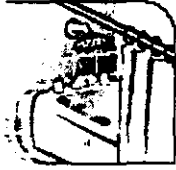
Visit our website at: www.scjohnson.com, www.scrubbingbubbles.com)

S.C. Johnson

A Family Company

Options Pictograms:

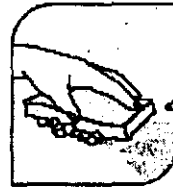
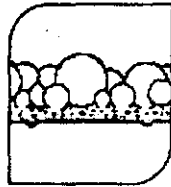
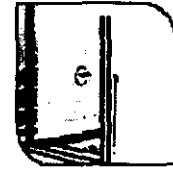
Tub & Tile



Sink & Counter



Shower Doors & Chrome



[Based on the EPA stamped accepted label dated October 22, 2004.]