

4822-548

04/12/2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

041207

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Dr. Alex Hawkins
Registration Specialist II for,
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Subject: Combo

EPA Registration Number 4822-548
Your Amendment Dated November 21st, 2006
EPA Received Date November 22nd, 2006

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add three additional alternate formulations utilizing three different fragrances and to add claims for control of Pseudomonas aeruginosa, Parainfluenza A type 3, and Human Coronavirus to the product labeling, is acceptable.

The proposed label claim that the product, Combo, is an effective disinfectant on hard, non-porous surfaces against the following microorganisms in the presence of a 5% organic load for the contact times listed below:

Human Coronavirus	5 minutes
Parainfluenza A Virus type 3	5 minutes
Pseudomonas aeruginosa	5 minutes

The proposed label claims that the fragrance variations of the Combo product, Combo 6 and Combo 7, are effective disinfectants on hard, non-porous surfaces against the following microorganisms in the presence of a 5% organic soil load for the contact times listed below:

Pseudomonas aeruginosa	5 minutes
Staphylococcus aureus	5 minutes
Salmonella choleraesuis	5 minutes

The designation of "Salmonella choleraesuis" has been changed to "Salmonella enterica" effective immediately. This change should be reflected on this current submission, and all future submissions.

Acceptance of this data to support a label claim for Human coronavirus *does not support* a label claims for this product as an effective disinfectant against he causative agent of Severe Acute Respiratory Syndrome (SARS).

On page 2 of the proposed label, the label claims that the product "eliminates odors caused by bacteria". Anywhere the phrase, bacteria, appears on the product labeling, it must be identified as "eliminates odor-causing bacteria".

In the "odor elimination" claims section and "Airborne Antimicrobial" claims section any reference to bacteria must be qualified with the phrase "odor causing".

In the "Airborne Antimicrobial claims" delete the claim "sanitizes the air (you breathe)(in the home).

On page 2 and 3 of the proposed label, the term, "scavenger" and "seeks out" must be removed from the proposed label language. Any language that suggests that the product "seeks out bacteria" is NOT acceptable.

On page 3, bottom, the phrase, "micro particles attach" must be removed from the label language.

On page 5, the phrase, "illness-causing " must be removed from the proposed product labeling.

The Confidential Statement of Formula dated November 21st, 2006, is acceptable.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

Handwritten signature of Dennis H. Edwards in cursive script.

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
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Combo

Active Ingredients:

Triethylene Glycol	6.0%
n-Alkyl (40% C ₁₂ , 50% C ₁₄ , 10% C ₁₆) dimethyl benzyl ammonium saccharinate	0.2%
Inert Ingredients:	93.8%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Precautionary Statements

Net Weight: _____

Citrus (Scent -or- Fragrance) / Clean (Scent -or- Fragrance) / Lemon (Scent -or- Fragrance) /
Floral (Scent -or- Fragrance) / Outdoor (Scent -or- Fragrance) / Spring (Scent -or- Fragrance) /
Springtime (Scent -or- Fragrance) / Fragrance Free

General Claims:

[One or more of the following general claims may appear on the final marketing label.]

- (Bonus Pack) (Multi-Pack) (Special Pack) (Value-Pack) (Better Value) (X% more free)
- (Economy Size) (Club Pack) (Value Size) (Trial Size) (Save Money By Buying Our Convenient Club Pack Size!) (Institutional Size) (Commercial Size) (Commercial Pack) (Industrial Pack)
- (Mega Pack) (Mega Size)
- (New Size) (New Scent) (Travel Size) (Pleasant Fragrance -or- Scent)
- (Big) (X% More Free) (X% Free) (X% More)

You'll know (Combo is) (it's) working when your air smells truly clean.

Combo (eliminates problem odors from) (works on tough odors such as) (is effective against tough odors from) (smoke) (mildew) (sinks and drains) (kitchens) (bathrooms) (basements) (bedrooms) (dining rooms) (living rooms) (kennels) (mobile homes) (campers) (garbage) (closets) (hampers) (game rooms) (studios) (cabins) (litter boxes) (workshops) (suitcases) (bars) (refrigerators) (after fire) (gyms) (offices) (garbage cans) (diaper pails) (cigars) (cigarettes) (pet odors) (cooking odors) (and) (boats)

Suitable for use in home and small businesses (such as) (offices) (schools) (daycares) (food service) (restaurants) (churches) (religious institutions) (hotels/motels) (convenience stores) (bed & breakfast) (barber shops & salons).

Use Combo every day throughout your (house) (home) to eliminate odor caused by bacteria.

Use Combo every day throughout your (house) (home) (to eliminate odor caused by airborne bacteria) (and) to leave your (house) (home) smelling clean and fresh.

Combo cleans the air you breathe.

Temporarily reduces inanimate airborne contaminants.

Formula binds to and chemically reacts with odor molecules (in mid-air) (in the air) to neutralize them and effectively make them odorless.

Makes your home a fresher place to be.

[Fragrance Name] has a (clean) (scent) (fragrance) (smell) (that doesn't linger) (that dissipates with the odors).

No overpowering (smell) (fragrance) (scent).

Eliminates odors with no lingering fragrance.

Leaves no lingering fragrance.

Leaves behind a clean smell that is not antiseptic.

Does not leave behind an antiseptic smell.

Leaves your home smelling as clean as it is.

(This product) Leaves no sticky residue (!)

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Odor Elimination Claims:

1) identify bacteria as "odor-causing"
2) remove "scavenger"

[One or more of the following odor elimination claims may appear on the final marketing label.]

odor-causing →

(New) (Combo) (Eliminates) (Reduces) (Controls) (is) (Effective against) odors (caused by bacteria).

(New) (Combo) Eliminates (odors) (smells) (rotten odors) (smelly odors) (heavy odors) (caused by bacteria).

Unlike air fresheners (that) (which) only mask odors (temporarily), (new) (Combo) eliminates (odors) (smells) (rotten odors) (smelly odors) (heavy odors).

(New) Combo (is an odor scavenger and) doesn't (just) mask odors (it eliminates them).

(New) Combo (is an odor scavenger and) doesn't just (disguise) (mask) (cover up) (bad smells) (odors) (offensive odors).

Get odors out with (new) Combo (!)

Don't cover up odor problems...remove them with (new) Combo.

Clear the air with (new) Combo.

(New) (Combo) Eliminates odors at their source.

(New) (Combo) (Reduces) (Controls) odors at their source.

Eliminate bacterial odors at the source with Combo.

odor-causing →

Unlike air fresheners, which only mask odors temporarily, (new) Combo (is an odor scavenger and) eliminates (tough pet and mildew) odors.

(Eliminates) (Effective against) (tough) (problem) odors around (litter boxes) (dirty laundry) (diaper pails) (garbage cans) (mud rooms) (pet sleeping areas) (and) (sick rooms).

Eradicate(s) odors.

Do away with (odors) (bad smells).

Air out the air (with (new) Combo)

(Eliminates) (Reduces) (Controls) (Effective against) (kitchen) (bathroom) (pet) odors caused by (airborne) bacteria.

Combo (is an odor scavenger and) (works to make) (makes) your home a fresher place to be.

Leaves your home (air) smelling (really) clean (and fresh) (and pleasant).

Makes your home (air) smell (really) clean (and fresh) (and pleasant).

(New) (Combo) Eliminates odors (caused by bacteria).

Odor Elimination (Eliminator)

Works (to eliminate odors).

Eliminate(s) (tough) (odors such as) (pet) (and) (mildew) (odors).

(New) (Combo) eliminates odors like you just opened a window.

(New) Combo (eliminates) (gets rid of) the (odors) (smells) (without just masking them) (... it doesn't just mask them).

Air so (clean) (pure) (fresh) (refreshed) you will (immediately -or- instantly) (notice appreciate) the difference.

It takes more than fresh air to clean your (home) (air) of odors.

(Cleans -or- cleanses) your air of odors.

(Cleans -or- cleanses) the air you breathe.

Air so clean you can smell the freshness.

Leaves no odors behind.

(New) Combo has a fragrance that is not (strong) (overpowering) so you'll know Combo is working when your air smells truly clean.

Unlike air fresheners that only mask odors temporarily, Combo eliminates tough odors such as pet, bathroom and mildew odors.

Specialized formulated to kill odor-causing bacteria on hard surfaces and in the air.

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Airborne Antimicrobial Claims:

1. remove "scavenger", "seeks out", "micro-particles attach"

[One or more of the following claims may appear on the final marketing label.]

(New) Combo (is an odor scavenger and) works to eliminate (odors) (smells) in the air by (seeking out and) (killing -or- destroying -or- eliminating) odor-causing airborne bacteria.

Temporarily reduces odor-causing (airborne) bacteria (in the air) (and eliminates their odors).

(New) (Combo) (seeks out and) (kills -or- eliminates -or- destroys -or- removes -or- reduces) odor-causing bacteria in the air (and eliminates -or- destroys -or- removes their odors).

(New) (Combo) (seeks out and) (kills -or- eliminates -or- destroys -or- removes -or- reduces) odor-causing airborne bacteria (and eliminates their odors).

(New) (Combo) Stops odor-causing airborne bacteria in their tracks (!)

(New) (Combo) (seeks out and) (kills -or- eliminates -or- destroys -or- removes) odor-causing bacteria in the air - unlike air fresheners, which only mask odors.

Keeps (on) (killing -or- removing -or- destroying -or- eliminating -or- reducing -or- controlling) odor-causing bacteria in the air.

Keeps odors away by (seeking out and) (killing -or- destroying -or- removing -or- eliminating -or- reducing -or- controlling) odor-causing bacteria in the air.

(New) (Combo) (kills -or- destroys -or- removes -or- eliminates -or- reduces -or- controls) the odor-causing bacteria that cause (bad -or- smelly -or- unpleasant) odors (in the air).

Combo helps reduce the number of odor-causing airborne bacteria in any room (to leave your home smelling clean and fresh).

Sanitizes the air (you breathe) (in your home).

(New) Combo (is an odor scavenger and) works to eliminate (odors -or- smells) in the air by (killing -or- destroying -or- removing -or- eliminating) odor-causing bacteria.

It takes more than fresh air to clean your (home) (air) of odor-causing (airborne) bacteria.

(For those of you who don't want bad odors -or- smells in their house -or- home), (new) Combo reduces (airborne) odor-causing bacteria in any room with a light fragrance to leave your (house) (home) smelling clean and fresh. Unlike air fresheners that only mask odors temporarily with fragrance, Combo eliminates tough (odors -or- smells), such as pet odor, bathroom, dirty diapers and mildew.

(New) Combo's (micro particles attach) to airborne odor-causing bacteria to clean (your) (the) air of these bacteria and (their) (smells -or- odors -or- smelly odors).

(Combo) (kills -or- destroys -or- removes -or- eliminates) odor-causing bacteria and their (tough) odors (throughout your home) (from) (bathrooms) (pets) (dirty laundry) (cooking) (mildew) (basements) (kennels) (garbage) (litter boxes) (and) (diaper pails).

(Combo) (Eliminates problem odors from) (Works on tough odors from) (is) (Effective against tough odors from) (mildew) (bathrooms) (litter boxes) (garbage cans) (diaper pails) (dirty diapers) (smelly shoes) (dirty laundry) (pets) (cooking) (by killing -or- removing -or- destroying -or- eliminating the bacteria that cause them).

Disinfection/Sanitization Claims:

[One or more of the following claims may appear on the final marketing label.]

[Note to Reviewer: The following symbols are used to relate claims and contact times to the appropriate microorganisms: for sanitization, bacteria are marked with an asterisk (*); fungi for fungistat claims are marked with two asterisks (**); for disinfectant/virucide/fungicide claims, bacteria are marked with a superscript dagger (†); viruses are marked with two superscript daggers (††); and fungi are marked with three superscript daggers (†††).]

Hard surface disinfectant and odor eliminator.

Sanitizes by killing 99.9 % of the bacteria* on hard, non-porous surfaces.

Disinfects hard (non-porous) surfaces by killing (greater than) (more than) 99.9% of germs.

Disinfects by killing germs on hard non-porous surfaces.

(Controls -or- Prevents -or- Inhibits -or- Effective against) mold** and mildew on hard, non-porous surfaces.

Disinfectant kills (odor-causing bacteria) (bacteria that cause odors) on hard, non-porous surfaces.

(Kills) (Eliminates) (Destroys) (Removes) (Reduces) (Controls) (Effective against) (most) (household) germs

(Kills) (Eliminates) (Destroys) (Removes) (Reduces) (Controls) (Effective against) (more than) (greater than) 99.9% of (household) (germs) (bacteria[†]) (viruses^{††}) (and) (fungi^{†††}) on hard, non-porous surfaces.

Kills 99.9% of (household) germs[†] (&) (and) viruses^{††} on hard, non-porous surfaces.

Kills (mold** and mildew) (viruses^{††} and bacteria[†]) on hard, non-porous surfaces.

Leaves surfaces sanitary.

Multi-surface (disinfectant) (sanitizer).

(Sanitizer:) Kills *Staphylococcus aureus* and *Klebsiella pneumoniae* on hard, non-porous surfaces in 30 seconds.

Sanitizes hard, non-porous surfaces in 30 seconds*.

This product will effectively inhibit the growth of mildew** and its odor when applied to hard, non-porous surfaces.

Disinfects and deodorizes by killing common (household) germs and controlling their odors.

(Eliminates -or- Controls -or- Kills -or- Effective against) odors caused by (bacteria) (germs) (mildew).

[Fragrance name] has a clean (scent) (fragrance) (smell).

Controls kitchen and/or bathroom odors caused by bacteria or mildew.

Controls pet odors caused by bacteria.

Controls odors caused by mold and mildew.

(Combo) Prevents odors at their source caused by (germs) (bacteria) (mildew)

(Combo) Kills the bacteria that cause (bad) odors on hard, non-porous surfaces

(Combo) Deodorizes by killing the bacteria that cause odors.

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Kills *Trichophyton mentagrophytes*, the causative agent of athlete's foot.
 Kills Influenza A, a causative agent of (flu) (influenza).
 (Kills) (Effective against) viruses that cause (the common cold) (colds and flu) (flu) (colds).
 (Kills) (Effective against) common (cold and flu) (flu) (cold) viruses.
 (Kills) (Effective against) (Controls) cold and flu viruses. → ~~remove~~
 Helps protect your family (from germs) (by killing illness-causing germs) (during cold and flu season).
 (This product) meets AOAC Germicidal Spray Product Test standards for hospital aerosol disinfectants.
 Approved for (hospital use) (use in) (<insert use site>).
 (This product) (Controls) (Aids in the reduction of) (Helps reduce) cross-contamination of many harmful germs from treated surfaces.
 For (use on) surfaces where germs are a concern.
 Kill(s) many of the germs you come into contact with every day.
 Kill(s) many of the germs you encounter every day.
 Formulated for use in homes and/or hospitals.
 Your partner in the fight against germs.
 Use (Combo) (in) (on) (around) (<insert use site>).

Use Sites (May be listed on product label in singular or plural form)

- | | |
|----------------------------|------------------------|
| Apartments | Health clubs |
| Assisted living facilities | Hospitals |
| Bars | Hotels |
| Barber shops & salons | House/Home |
| Basements | Kennels |
| Bathrooms | Kitchens |
| Bed & Breakfast (inns) | Living rooms |
| Bedrooms | Lockers |
| Boats | Mobile homes |
| Cabins | Motels |
| Campers | Mud rooms |
| Churches | Nursing homes |
| Closets | Offices |
| Condos | Physician offices |
| Convenience stores | Religious institutions |
| Daycare facilities | Restaurants |
| Dental offices | Schools |
| Dining rooms | Sick rooms |
| Food service (restaurants) | Studios |
| Game rooms | Townhouses/Townhomes |
| Gyms | Workshops |
| Hampers | |

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Kills on surfaces:

5-Minute Disinfectant / Virucide / Fungicide:

Bacteria:

† *Staphylococcus aureus* (Staph), *Salmonella enterica* (Salmonella), *Listeria monocytogenes* (Listeria), *Enterococcus faecalis*, *Escherichia coli* (E. coli), *Enterobacter aerogenes*, *Campylobacter jejuni*, *Pseudomonas aeruginosa*

Virucide:

†† Rotavirus (the leading cause of infectious diarrhea in children), Respiratory Syncytial Virus (RSV) (the leading cause of lower respiratory infection in children and/or an important cause of ear infections in children), Influenza A (flu), Herpes Simplex Virus Type 1, Herpes Simplex Virus Type 2, Human Coronavirus, Parainfluenza A Virus Type 3

Fungicide:

††† *Trichophyton mentagrophytes* (the fungus that causes athlete's foot)

30-Second Hard Surface Sanitizer:

* *Staphylococcus aureus* (Staph), *Klebsiella pneumoniae*

Fungistatic - Prevents, Inhibits, Controls:

** *Aspergillus niger* (mold and mildew)

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Works on: (air) (appliances) (bathtubs) (countertops) (diaper pails) (doorknobs) (many non-wood crib surfaces) (non-wood changing tables) (recycling bins) (sinks) (telephones) (toilets) (and) (trash cans).

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

SHAKE WELL BEFORE EACH USE.

Pre-clean hard non-porous surfaces (before using) (this product) (Combo). Wherever food contact is likely, rinse surface with (clean) (potable) (tap) water after using (this product) (Combo).

TO TEMPORARILY REDUCE AIRBORNE BACTERIA and eliminate odors in an average room (12' x 12' x 9'), close all doors, windows and air vents and spray product upward in center of room for 10 seconds. For maximum effectiveness, relative humidity should be between 45% and 70%. Resume normal room ventilation after spray has settled.

TO DISINFECT (AND KILL) (BACTERIA†) (VIRUSES††) (FUNGI†††) (AND) (OR) (GERMS) (ON) HARD, NON-POROUS SURFACES: Spray pre-cleaned surface until wet. Allow product to remain on surface for 5 minutes. (Then wipe) (if desired).

TO SANITIZE* HARD, NON-POROUS SURFACES: Spray pre-cleaned surface until wet. Allow product to remain on surface for 30 seconds. (Then wipe) (if desired).

TO (CONTROL) (INHIBIT) (AND) (OR) (PREVENT) THE GROWTH OF MOLD** AND MILDEW (AND THEIR ODORS): Spray pre-cleaned surface until (wet) (misted). Let the treated surface air dry. Re-apply (as necessary) (as desired).

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AC:
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Do not use on polished wood, painted surfaces or acrylic plastics.

DO NOT SPRAY ON PETS.

Storage and Disposal

STORAGE: Store away from heat, sparks and open flame in an area inaccessible to 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 the can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap the container and discard in trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & 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. Avoid contact with food and food utensils.

Before using product throughout your home, use in one room and wait 24 hours to ensure that no one has any physical reactions to the product.

Asthma and Allergy Sufferers:

Consult your physician before using this product in your home.

Before spraying remove birds. After use, ventilate normally prior to returning birds to treated area.

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 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.

ATTENTION: Use only as directed. Intentional misuse by deliberately concentrating and inhaling the contents can be harmful or fatal. Help stop inhalation abuse. For information visit www.inhalant.org.

PHYSICAL/CHEMICAL HAZARDS: EXTREMELY FLAMMABLE. Keep away from fire, sparks and heated surfaces. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 120° F may cause bursting.

EPA Reg. No. 4822-548 EPA Est. No. _____

S. C. Johnson A Family Company
Questions? Comments? Call 1-800-558-5252 or write Helen Johnson.
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Please recycle when empty (!)



Federal regulations prohibit CFC propellants in aerosols.



[Based on the EPA stamped accepted label (with comments) dated October 10, 2006.]

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