Mark Jernigan Regulatory Affairs Manager Bio-Lab, Inc P O Box 300002 Lawrenceville, GA 30049

NOV 1 3 2012

Subject

the Works Disinfectant Toilet Bowl Cleaner

EPA Registration No 5185-494 Notification Date October 16, 2012 EPA Receipt Date October 19, 2012

Dear Mr Jernigan,

This letter acknowledges receipt of your notification submitted under the provisions of FIFRA section 3(c)9 and PR Notice 98-10

Proposed Notification

Adding additional marketing statements to the front and back panels to the label

General Comments

Based on a review of the submitted materials, to add additional marketing statements to the label are acceptable and apart of the record on file for future reference

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane jacqueline@epa gov or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at rivas lorena@epa gov When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing

Sincerely,

ueline Campbell-McFarlane

Product Manager (84)

Regulatory Management Branch II Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL 75107							
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EPA Form 1320-1A (1/90)

Printed on Recycled Paper

SEPA	Environmenta	United States Mental Protection Agency Washington DC 20460		Form Approv	Registration Amendment Other		O. Approval expires 2 28 OPP Identifier Number		
		Application	n for Pesticio	le - Section	ı				
Company/Product Nun 5185-494	roduct Number		ŀ	2 EPA Product Manager J Campbell-McFarlane			3 Proposed Classification ✓ None Restricted		
Company/Product (Nather works Disinfecta	me) int Toilet Bowl Cleane	er	PM# 34						
Bio-Lab Inc PO Box 300002 Lawrenceville GA	Applicant (Include ZIP Co 30049 this is a new address	ode)	(b)(ı) m to EPA R		nilar or identi	ical in coi	FIFRA Section 3(c)(3) mposition and labeling		
			Section - I						
Amendment Exp	esponse to Agency letter	r dated		Final printed labe Agency letter da Me Too Applic Other Explain b	ted ation	to .			
	Category Not Applicable (inal marketing statements e for certification	, , , , , , , , , , , , , , , , , , ,		beling Notification	s) Part N (Oth	er Revision	ns)		
1 Material This Product	Will Be Packaged In								
Child Resistant Packaging Yes No * Certification must be submitted	Yes Voc	No per container	Water Soluble Pa Yes ✓ No If Yes Package wgt	No per container	2 Type of (Container Metal Plastic Glass Paper Other (S.	pecify)		
Location of Net Conter	nts Information Container	4 Size(s) Reta	II Container	1 .	ocation of Lab	el Directio	ns		
6 Manner in Which Labe	I is Affixed to Product	Lithogra Paper g Stencile	aph lued ad	✓ Other th	erimage				
			Section - IV	,					
1 Contact Point (Comple	ete items directly below i	for identification	of individual to be	contacted if ned	essary to pro	cess this	application)		
Name Mark Jernigan		1	ritle Regulatory Affairs	Manager		Telephone 678 502 4	No (Include Area Code) 149		
I certify that the st I acknowledge that both under applical	atements I have made or t any knowlinglly false or ble law	Certificat this form and a misleading stat	all attachments the	reto are true acc shable by fine or	urate and con imprisonment	nplete or	6 Date Application Received (Stamped)		
2 Signature Mass	Temgar	1	Title Regulatory Affairs N	lanager					
Typed Name Mark Jernigan	7		Date 10//	6/12					



October 16, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Re the Works Disinfectant Toilet Bowl Cleaner EPA Registration No 5185-494

Dear Ms Campbell-McFarlane

Please process the enclosed notification for the above referenced product

The purpose of this notification is to add optional marketing claims to the front and back panels. New text has been underlined in blue ink

A note of clarification regarding one claim that has been added to the label for use when product is sold in 32 fl oz containers "33% MORE than other leading national brands***" and footnoted with the statement "***Compared to 24 fl oz of other leading national brands". This claim is a price by volume statement intended to compare the product's price by volume with competitor's price by volume. BioLab believes that this claim is addressed in PR Notice 98-10 under Section IV (Non-notifications), Part F (Non-Pesticidal Characteristics), Item 4 (Price). Claims regarding price or price-related marketing information such as low price. 25 cents off and rebate available. As such, this claim should be a permissible addition without notice to EPA as "price or price related marketing information" as long as it is not misleading. Since this statement is not specifically listed in the PR Notice, we are including it in this notification for clarity as part of our label.

Enclosed are

- 1 Application for Pesticide (EPA Form 8570-1),
- 2 Notification Certification Statement, and
- 3 Proposed label with changes marked (underlined in blue ink)

If you have any questions, please call me at 678-502-4149 or mark jernigan@chemtura com

Thank you for your attention to this matter

Sincerely,

Mark Jernigan/

Regulatory Affairs Manager

P O Box 300002 Lawrenceville GA 30049 1002 USA (678) 502 4000 (678) 502 4764 FAX

The Works® Disinfectant Toilet Bowl Cleaner

[Kılls 99 9% of Household Bacteria*

*See back panel for list of types]

[Kılls Household Bacteria*

*See back panel for list of types]

[Removes Rust, Lime Scale, & Hard Water Stains]

[ORIGINAL**]

[** See back panel]

[BACTERIA + STAIN FIGHTING ACTION]

[Cleans & Disinfects]

[33% MORE than other leading national brands***] {When sold in 32 fl oz (quart) size}

[***Compared to 24 fl oz of other leading national brands]

ACTIVE INGREDIENT

Hydrogen Chloride 20 00% OTHER INGREDIENTS 80 00%

TOTAL 100 00%

KEEP OUT OF REACH OF CHILDREN DANGER

See First Aid and other precautionary statements on back label

Bio-Lab, Inc P O Box 300002 Lawrenceville, GA 30049 EPA Reg No 5185-494 EPA Est No 5185-GA-01

Net Contents {as indicated on container}

NOTIFICATION 3/12

new text

The Works Disinfectant Toilet Bowl Cleaner

Removes Rust Stains and Lime Deposits

*Kılls the following Household Bacteria!

•Salmonella choleraesuis

•Escherichia coli

•Staphylococcus aureus

Will Not Harm Septic Systems 4

[** This product is based on original formula registered with EPA]

READ ENTIRE LABEL BEFORE USING - FOR TOILET BOWL USE ONLY

It is a violation of federal law to use this product in a manner inconsistent with its labeling ATTENTION DO NOT MIX WITH CHLORINE-TYPE BLEACHES OR OTHER HOUSEHOLD CHEMICALS

DIRECTIONS FOR USE

To open-Hold bottle firmly, push down on cap and turn counter-clockwise Be careful not to squeeze bottle when removing cap To reseal, turn cap clockwise until tightly closed TO CLEAN BOWL Flush toilet Raise toilet seat Open cap and point bottle down into bowl Carefully direct product onto sides of the bowl and under the rim Close cap Brush to cover all surfaces of the bowl Flush toilet For heavily stained bowl, repeat above procedure TO CLEAN TANK Empty tank and apply to sides Do not apply directly to internal working parts Brush then fill and flush

The Works Disinfectant Toilet Bowl Cleaner can be use as a disinfectant in homes, schools, and offices

DO NOT SPILL OR PLACE ON COUNTERTOP, CARPET, FLOORING, BATHTUB, SINK, ENAMEL OR CHROME SURFACES CLEAN SPILLS IMMEDIATELY! FOR TOILET BOWL USE ONLY!

TO DISINFECT Remove heavy soil from surfaces with bowl brush Apply at least 6 fl oz of product onto all interior bowl surfaces Let product remain 10 minutes before brushing, making sure to get under the rim Flush with clean water

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER CORROSIVE Causes skin burns and irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes, on skin, or on clothing. Wear goggles or safety glasses, protective clothing, and rubber (or chemical-resistant) gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

CHEMICAL HAZARDS DO NOT mix with chlorine-type bleaches or other household chemicals

FIRST AID IF IN EYES Hold eye open and runse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue runsing eye. Call a poison control center or doctor for treatment advice. IF ON SKIN OR CLOTHING. Take off contaminated clothing. Runse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. IF SWALLOWED. Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. IF INHALED. Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment [IN CASE OF MEDICAL EMERGENCY, CALL [1-303-623-5716] [1-877-800-5553] [telephone number supplied by supplemental registrant]

NOTE TO PHYSICIAN Probable mucosal damage may contraindicate the use of gastric lavage

STORAGE AND DISPOSAL Keep this product in original tightly closed container when not in use Store in a cool, dry, well ventilated area **PESTICIDE STORAGE** Store out of reach of children in original container **CONTAINER DISPOSAL** Non-refillable container Do not reuse or refill this container Offer for recycling, if available Triple rinse container (or equivalent) promptly after emptying

NOTE Buyer assumes all responsibility for safety and use not in accordance with directions

Questions? Comments? 1-800-xxx-xxxx