

5185-495

11/13/2012

1/6

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

NOV 13 2012

Subject: the Works Disinfectant Thick Toilet Bowl Cleaner  
EPA Registration No.: 5185-495  
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.

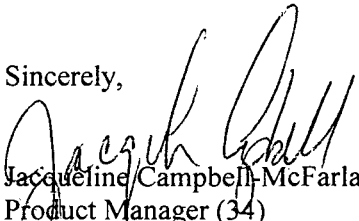
**Proposed Notification**

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](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Lorena Rivas by telephone at (703) 305-5027 or by e-mail at [rivas.lorena@epa.gov](mailto: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,  
  
Jacqueline Campbell-McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL	7510P						
SURNAME	J. Rivas						
DATE	11/13/12						



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 5185-495	2. EPA Product Manager J. Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) the works Disinfectant Thick Toilet Bowl Cleaner	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Bio-Lab, Inc. PO Box 300002 Lawrenceville, GA 30049 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Fee Determination: Fee Category - Not Applicable (Notification) mark.jernigan@chemtura.com

Notification to add additional marketing statements. Per PR Notice 98-10, Section II, (Labeling Notifications), Part N (Other Revisions). Please see attached page for certification.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8, 20, 24, 30, 32 fl oz		5. Location of Label Directions <input checked="" type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input checked="" type="checkbox"/> Other therimage		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Mark Jernigan		Title Regulatory Affairs Manager		Telephone No. (Include Area Code) 678-502-4149	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Affairs Manager			
4. Typed Name Mark Jernigan		5. Date 10/16/12			



3/6

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 Thick Toilet Bowl Cleaner**  
**EPA Registration No.: 5185-495**

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](mailto:mark.jernigan@chemtura.com).

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark Jernigan", is written over a horizontal line. The signature is fluid and cursive.

Mark Jernigan  
Regulatory Affairs Manager

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

{All text in brackets [xxx] is optional and may or may not be included on a final label.}  
 {All text in braces {xxx} is administrative and will not appear on a final label.}

**the works® Disinfectant Thick Toilet Bowl Cleaner**

[Spring Fresh Scent!]  
 [Crisp Clean Scent!]  
 [Thick Clinging Action!]  
 [Disinfects!]  
 [Removes Rust, Lime Scale, Hard Water Stains] [ON CONTACT!]  
 [Rust Stains]  
 [Lime Scale]  
 [Hard Water Build-Up]  
 [Kills 99.9% of Household Bacteria\*]  
 \*See back panel for list of types]  
 [Thick Formula]  
 [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.]

new text

new

ACTIVE INGREDIENT:  
 Hydrogen Chloride . . . . . 16%  
 OTHER INGREDIENTS . . . . . 84%  
 TOTAL . . . . . 100%

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. 5185-495  
 EPA Est. No. 5185-GA-01

Net Contents: {as indicated on container}

NOTIFICATION  
 Date Reviewed: 4/13/12  
 Reviewed By: J. Rivas

## the works Disinfectant Thick Toilet Bowl Cleaner

Removes Rust Stains and Lime Deposits!

\*Kills the following Household Bacteria

- *Pseudomonas aeruginosa*
- *Salmonella choleraesuis*
- *Staphylococcus aureus*
- *Escherichia coli*

[Spring Fresh Scent!]

[Crisp Clean Scent!]

[\*\* This product is based on original formula registered with EPA.] *← new text*

### 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, follow directions 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. The Works Disinfectant Thick Toilet Bowl Cleaner can be used as a disinfectant in Homes, Schools, Offices and Hospitals. DO NOT SPILL OR PLACE ON COUNTERTOP, CARPET, FLOORING, BATHTUB, SINK, ENAMEL OR CHROME SURFACES. CLEAN SPILLS IMMEDIATELY with a damp cloth or sponge. WILL NOT HARM PLUMBING AND SEPTIC SYSTEMS.

**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, inhaled or absorbed through skin. Avoid breathing vapor. 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.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not mix with chlorine-type bleaches or other household chemicals.

6/6

**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. **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. **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