April 28, 2003

Theresa A. Adkins
The Clorox Company
c/o PS&RC
P.O. box 493
Pleasanton, CA 94566-0803

Subject.

Tilex

EPA Registration No. 5813-24

Submission Dated: February 26, 2003 Receipt Date: February 27, 2003

Dear Ms. Adkins:

The following amendment, submitted in connection with registration under the Federal Insecticide. Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted with comment.

## Comment

The claims for "Mildew Root Detector" will not be accepted as part of the label. The information provided does not adequately justify the theory that this product actually detects mildews roots and differentiates them from non-roots.

# **General** Comments

A stamped copy of the accepted labeling is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Wanda Mitchell at (703) 308-6345.

Sincerely,

Robert S. Brennis

Product Manager - Team 32

Regulatory Management Branch II Antimicrobials Division (7510C)

SYMBOL Z5/6C

SURNAME MILLIAN

DATE H-2

EPA Form 1320-1A (1/90)

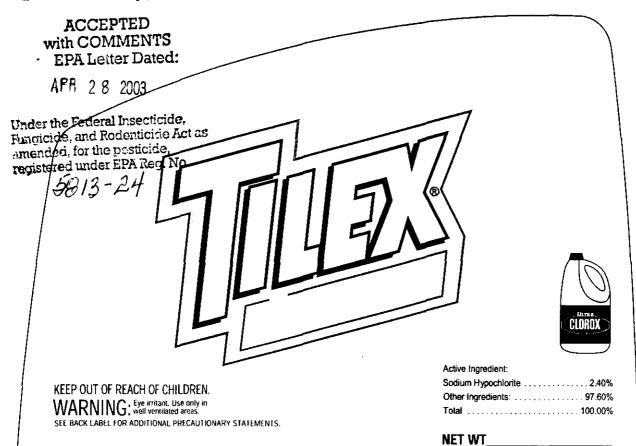
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<u>Underlined text is new.</u> Strike-through (text) means removed.

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#### PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

WARNING: Causes substantial but temporary eye injury and can irritate skin. For sensitive skin or prolonged use, wear gloves. Do not get in eyes or on clothing. Vapors may irritate. Use only in well ventilated areas. Avoid prolonged breathing of vapors. Not recommended for use by persons with heart conditions or chronic respiratory problems such as asthma, emphysema or obstructive lung disease. Due to irritating nature, may be harmful if swallowed.

## 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 eyes. IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. IF BREATHING IS AFFECTED: Move person to fresh air. If person is not breathing, call 91 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glassful of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS: This product contains bleach. Do not use or mix this product with other household chemicals such as products containing ammonia, toilet bowl cleaners, rust removers, vinegar or acid. To do so will release hazardous gases.

STORAGE AND DISPOSAL: Store this product in a cool [dry] area [away from direct sunlight and heat] to avoid deterioration. Do not reuse empty container. Offer empty container for recycling, if recycling is not available, discard container in trash.



Contains No Phosphorus. Best If Used By Date Below: EPA Reg. No. 5813-24, EPA Est. No. 5813-CA-3, GA-1 (Actual EPA Est. No. in code below) U.S. Patent Pending

Questions or comments: Call toll free 1-800-227-1860 www.tilex.com Mfd. for & ©2002 The Clorox Company, Oakland, California 94612. Made in USA.

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## AVOID PROLONGED BREATHING OF VAPOR

Use in well ventilated areas. Open windows and turn on fans before use. If the vapors bother you, leave the room while this product is working. For sensitive skin or prolonged use, wear gloves. Do not mix with Tilex\* Soap Scum Remover -or- Tilex\* Soap Scum and Bathroom Cleaner.

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

#### HOUSEHOLD USE:

#### For non-foaming trigger:

TO REMOVE MILDEW STAINS: Turn sprayer nozzle to SPRAY position. Spray, wait until stains disappear and rinse. Heavy mildew buildup may require longer contact time, or two cleanings.

#### For foaming trigger:

TO REMOVE MILDEW STAINS: Turn nozzle to FOAM position. Spray 6-8 inches from surface until surface is thoroughly covered. Allow foam [and the Mildew Root Detector] to deeply penetrate mildew and problem areas. Wipe with a wet sponge or cloth, and rinse. Heavy mildew buildup may require longer contact time, or two cleanings. If excess foam dries on nozzle, rinse with warm water.

#### For both the foaming and non-foaming triggers:

TO DISINFECT AND KILL MOLD & MILDEW ON HARD, NONPOROUS SURFACES such as glazed ceramic tile: Spray surface until thoroughly wet, let stand 5 minutes, and rinse.

TO KILL MOLD & MILDEW ON HARD, POROUS SURFACES such as grout and cement: Spray surface until thoroughly wet, let stand 10 minutes, and rinse.

TO CLEAN SOAP SCUM: Spray, wait a few minutes, wipe with sponge. Heavy soap scum or mildew buildup may need two cleanings. This product may not be able to remove soap scum and mildew embedded in hard water deposits, old grout or silicone caulking. FOR SOAP SCUM PROBLEMS: Use Tilex® Soap Scum Remover or Tilex® Soap Scum and Bathroom Cleaner.

Works on grout, [bath]tubs, toilets, fiberglass, shower doors, vinyl curtains, counters -or- countertops, sinks, glass, plastic, glazed ceramic tile, unglazed ceramic tile, no-wax floors, basement floors, windowsills, refrigerator seals, and under the sink. Rinse immediately after use on rubber, plastic and vinyl. Avoid prolonged contact with metal and old porcelain as this product can react with these materials and leave a "rusty" stain. Do not use on wood or painted surfaces unless you plan to refinish or repaint them. This product may not be able to remove mildew embedded in hard water deposits, old grout or silicone caulking. Avoid contact with aluminum, clothes, fabric, carpet or paper surfaces as they will discolor. BIG JOBS: Tilex can effectively clean many household surfaces. For convenience, use the turnet top or refill your Tilex sprayer bottle.

## WHERE TO USE:



TO CLEAN AND DISINFECT TOILET BOWLS: Flush toilet and add 1 cup Tilex to bowl. Brush to thoroughly wet all surfaces including under rim. Let stand 5 minutes before flushing.



FLOORS: Mop washable floors including no-wax floors, linoleum, vinyl and ceramic tile with 1 cup Tilex per gallon of warm water. Rinse for best shine.



CEMENT POOL AREAS: Apply liberally (full strength) and rinse. VINYL AND PLASTIC OUTDOOR FURNITURE: Sponge on full strength and rinse immediately.

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# Cleaning Claims

- Bathrooms, sinks and faucets and floor areas
- Commercial solutions
- · Contains bleach
- · Economy refill
- Economy size
- Just spray and wipe; no scrubbing required!
- · Lemon Fresh Fragrance
- · Lemon Fresh [scent]
- Leaves no residue
- Mama's got the magic of Clorox™
- New sudsing -or- foaming action
- · Plus [with] Clorox\* Bleach
- · Poot and outdoor areas

#### Pesticidal Claims

- Destroys mold and mildew in (just) 5 minutes
- . Destroys mold, mildew and bacteria [in just 5 minutes]
- · Disinfects as it cleans big jobs
- Disinfects as it kills (destroys) [eliminates] (wipes out) [removes] mildew
- Disinfects as it kills [destroys] [eliminates] common household mold, mildew and bacteria
- · Disinfects with bleach
- Easily removes mildew, mold and bacteria from grout and also quickly destroys and kills them in hard-to-clean areas such as caulking, corners and crevices, without scrubbing
- · Easily removes tough mildew and mold from grout
- Eliminates mold and mildew in [just] 5 minutes
- · Eliminates mold, mildew and bacteria [in just 5 minutes]
- · Even mold isn't too tough for Tilex!
- Got Mold? Kill [Destroy] [Eliminate] [Wipe out] [Remove] it with Tilex!
- Kills [Destroys] [Eliminates] [Wipes out] [Removes] mold, mildew and bacteria as it cleans
- Kills [Destroys] [Eliminates] [Wipes out] [Removes] visible mold
- · Kills [Destroys] [Eliminates] 99.9% of household molds
- Kills [Destroys] [Eliminates] 99.9% of household molds and mildew in just 5 minutes
- · Kills [Destroys] [Eliminates] and removes mold and mildew
- · Kills [Destroys] [Eliminates] mildew without scrubbing
- · Kills [Destroys] [Eliminates] mold and mildew
- · Kills [Destroys] [Eliminates] tough mildew without scrubbing
- · Kills [Destroys] [Eliminates] tough mold and mildew without scrubbing
- Kills [Destroys] [Eliminates] tough mold, mildew and bacteria in just 5 minutes
- · Kills [Eliminates] and destroys mold and mildew

- . Kills mold and mildew in [just] 5 minutes
- · Kills mold, mildew and bacteria [in just 5 minutes]
- · Kills most common household molds
- Lifts off and cleans soap scum to penetrate, kill and destroy mold, mildew and bacteria
- Mold is alive. Kill [Destroy] [Eliminate] [Wipe out] [Remove] it with Tilex!
- Not only destroys mold and mildew, but also destroys and removes the mold spores
- Not only eliminates mold and mildew, but also destroys and removes the mold spores
- Not only kills mold and mildew, but also destroys and removes the mold spores
- Penetrates to eliminate and destroy tough mold, mildew and bacteria at its source
- Penetrates to kill and destroy tough mold, mildew and bacteria at its source
- · Proven to kill most common household molds!
- This product kills Staphylococcus aureus (Staph), Streptococcus pyogenes (Strep), Trichophyton mentagrophytes (Athlete's Foot Fungus), Aspergillus niger (mildew). Salmonella choleraesuis (Salmonella), Pseudomonas aeruginosa (Pseudomonas), Penicillium chrysogenum (Penicillium), Alternaria alternata, Cladosporium herbarum, Mucor bainieri
- Tilex doesn't just clean [the] stains, it kills [destroys] [eliminates] [wipes out] [removes] [the] mold!
- Works [Kills mold] on all [hard, porous and nonporous] bathroom surfaces
- You've got mold. Kill [Destroy] [Eliminate] [Wipe out] [Remove] it with Tilex.

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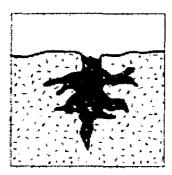


#### Pesticidal Claims - Continued

#### For use with Formula A07 and foaming trigger:

- · Gets into and eliminates mildew even in hard to clean places without scrubbing
- · Kills mold and mildew at its roots
- · Kills mold and mildew in hard to clean areas (places) [such as caulking, corners, crevices, cracks]
- This product -or- Mildew Root Detector penetrates deep beneath the surface
- Penetrates to kill and destroy tough mold, mildew and bacteria at its
- · Penetrates to kill mildew in hard to clean places

- · [Seeks out and] kills mildew at its roots
- · [Seeks out and] kills mildew even in hard to clean places
- This product has a penetrating foam [with the patented Mildew Root Detector formula) that seeks out and kills mildew even in tile grout, caulking and corners
- With Deep Penetrating Foam
- · With Foaming Root Detector
- · With Mildew Root Detector



Mildew grows deep in cracks.





Form penetrates deep to lett milder at its roots.

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