

5813-24

12-23-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

DEC 23 2010

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Elise Estremera-Pasky
The Clorox Company
c/o PS&RC
P.O. Box 493
Pleasanton, CA 94566-0803

Subject: Tilex
EPA Registration No. 5813-24
Application Dated: September 23, 2010
Receipt Dated: September 27, 2010

Dear Ms. Estremera-Pasky:

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

Label Revisions

1. Addition of marketing claims
2. Addition of H1N1 claims per Agency guidance
3. Addition of pesticidal claims
4. Modification of non-pesticidal uses instructions
5. Addition of packaging related statements

Conditions

1. The term "clean" is not optional to marketing claims that refer to "Powerful" cleaning. Therefore, the brackets have been removed from these claims.
2. Please note: Should you wish to retain a reference to the company's website on your label, then please be aware that such a reference transforms the website into labeling under the Federal Insecticide Fungicide and Rodenticide Act sec 2 (p) (2) and then the website is subject to review by the Agency. If the website content is false or misleading, the product would be misbranded and its sale or distribution unlawful to sell or distribute under FIFRA section 12(a)(1)(E). In addition, regardless of whether a website is referenced on your product's label, claims made on the website may

not substantially differ from those claims approved through the registration process. Although EPA has not yet determined the extent to which it will routinely review company websites, if the Agency finds or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from claims approved through the registration process, the website may be referred to the EPA's Office of Enforcement and Compliance Assurance.

General Comments:

A stamped copy of the labeling accepted with conditions is enclosed. Submit one 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 me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,


Wanda Y. Henson
Acting Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

TILEX®

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 23 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.

5813-24

Contains
Bleach



KEEP OUT OF REACH OF CHILDREN.

WARNING: EYE IRRITANT. USE ONLY
IN WELL VENTILATED AREAS.

SEE BACK LABEL -or- PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS.

Active Ingredient:
Sodium Hypochlorite 2.40%
Other Ingredients: 97.60%
Total: 100.00%

[(Yields 2.28% available chlorine)]

NET WT _____

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. (this statement will appear in color)** 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 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. **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.

Contains No Phosphorus.
[Best If Used By Date Below:]
EPA Reg. No. 5813-24, EPA Est. No. 5813-CA-3,
CA-4, CA-5, GA-1, PR-1; 71106-GA-1, GA-2;
71681-IL-1, IL-2, GA-1; 82427-GA-1
(Actual EPA Est. No. in code below)
U.S. Patent Pending

Questions or comments[?]: [Call toll free] 1-800-227-1860 (in the US)
-or- (787) 641-4943 (in Puerto Rico) [or visit www.tilex.com].
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1221 Broadway, Oakland, CA 94612
[and Dist. by & © XXXX Clorox Commercial Company,
[Ave. Chardon, #350, Torre Chardon, Suite 320,] [San Juan, PR 00918].
(bracketed text for Puerto Rico only)
Made in USA -or- Made in Puerto Rico



Packaging Related Statements and Icons:

[Padlock icon unlocked and locked (on bottle shrink) with corresponding arrow (molded into trigger)]

[Refill only with this product]

Alternate for Refill Bottle: To Refill [Spray Bottles]:

[Remove]

1. Remove trigger sprayer -or- cap [from empty bottle]

[Pour]

2. Unscrew cap on refill and pour contents directly into empty bottle.

[Use]

3. Replace trigger sprayer [and use as you normally would].

-or-
[Remove trigger sprayer from empty bottle,] unscrew cap and transfer your trigger to this bottle.

Trigger options:

To foam: Close screen on nozzle, or to spray, open screen on nozzle.

To spray every drop: Tilt bottle at a downward angle while spraying.

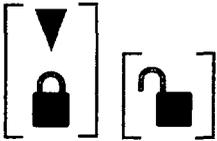
To refill: Turn trigger on spray bottle 1/8th turn counterclockwise and pull upwards to remove. After refilling spray bottle, replace trigger by aligning tube on trigger with tube inside bottle and turn clockwise while pushing down until it clicks into place.

Refill only with this product.

-or-

To refill: Turn trigger on spray bottle [1/8th turn] counterclockwise [and pull upwards] to remove. [After refilling spray bottle,] Replace trigger by aligning tube on trigger with [opening] [tube] inside bottle and turn clockwise [while pushing down] [-and/or- push [sprayer] straight down [until it clicks] [-and/or- locks into place]].

- When almost empty, -or- To spray every drop, tilt bottle downward -or- at a downward angle [while spraying].
- [To foam (close screen on nozzle) or spray (open screen on nozzle)].



Residential/Household uses (16 fl oz, 32 fl oz RTU spray)

STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. Do not reuse or refill except as described in the directions for use. Refill only with this product. [Please] recycle empty container or discard in trash.

Residential/Household uses (64 fl oz direct application/dilutable non-spray)

STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Nonrefillable container. Do not refill or reuse this container. [Please] recycle empty container or discard in trash.

Professional/Institutional uses (32 fl oz RTU spray)

STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. Do not reuse or refill except as described in the directions for use. Refill only with this product. [Please] recycle empty container or discard in trash.

Professional/Institutional uses (64 fl oz, 128 fl oz direct application/dilutable non-spray)

STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Nonrefillable container. Do not refill or reuse this container. [Triple rinse promptly, then] [please] recycle empty container or discard in trash.



DIRECTIONS FOR USE

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

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 -or- Lestoil® Baño.

[Refill only with this product]

Alternate for Refill Bottle:

To Refill [Spray Bottles]:

Remove

1. Remove trigger sprayer -or- cap from empty bottle.

Pour

2. Unscrew cap on refill and pour contents directly into empty bottle.

Use

3. Replace trigger sprayer and use as you normally would.

-or-

[Remove trigger sprayer from empty bottle,]

unscrew cap and transfer your trigger to this bottle.

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 -or- FOAM-SPRAY -or- [For tough jobs,] turn nozzle to FOAM-STREAM [position] (*trigger has "foam-stream" and "foam-spray" listed on the nozzle*). Spray 6-8 inches from surface until surface is thoroughly covered. Allow foam 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 Remove Mildew Stains: Spray 6-8 inches from surface until surface is thoroughly covered. Allow foam 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.

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. This product kills *Staphylococcus aureus* (Staph), *Streptococcus pyogenes* (Strep) and *Trichophyton mentagrophytes* (Athlete's Foot Fungus).

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

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 or Tilex Bathroom Cleaner.

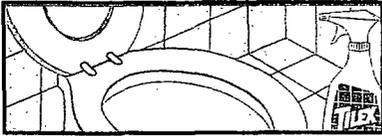
[Works on grout, [bath]tubs, toilets, fiberglass, shower doors, vinyl curtains, counters -or- countertops, sinks, glass, plastic, glazed ceramic tile, unglazed ceramic tile, no-wax floors, basement floors, windowsills, refrigerator seals, and under the sink.]

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 turret top or refill your Tilex sprayer bottle.]

DIRECTIONS FOR USE Continued

WHERE TO USE:



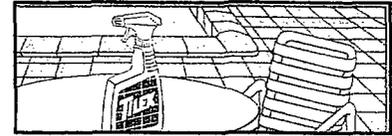
TO CLEAN AND DISINFECT TOILET BOWLS:

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.



TO CLEAN CEMENT POOL AREAS:

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

Cleaning/Miscellaneous Claims

• New [and -or- & Improved][!] *to be used as a claim descriptor only for the first 6 months of product on shelf*

- 2-in-1 trigger [option]
- [40oz] [44oz] for the 32oz price!
- All-Spray -or- Easy Spray -or-Empt-Ease -or- Reliaspray -or- Spray-All [Bottle] [Technology]
- Attacking Foam
- Attacks grime [and stains***]
- Bathrooms, sinks and faucets and floor areas
- [Be] [Get] Refill Smart™ [!]
- Bleaches away stains
- Brilliantly cleans [tile, grout, surfaces] before your eyes[!]
- Brilliantly whitens [tile, grout, surfaces] before your eyes[!]
- Brilliantly whitens [tile, grout, surfaces] for an intense clean[!]
- Check out the new price!
- Cheaper than [two] [2] 32 fl oz trigger[s] [sprays]*
- Clinging Foam
- Commercial solutions
- Contains bleach
- Cuts through -and/or- [starts to] dissolve[s] soap scum [on bathroom surfaces]
- [Deep Penetrating Foam]
- [Deep] [Penetrating] Foam clings to mildew stains
- [Deep] [Penetrating] Foam provides [great] control to reach mildew stains even in cracks -and/or- crevices -and/or- corners
- Dissolves[s] soap scum -and/or- [other] tough [bathroom] soils -and/or- stains
- Dual Action Trigger
- Dual Action Trigger provides spray and foam options -or- settings
- Dual Action Trigger provides spray for [broad] coverage and foam for control
- Easy Drop Delivery
- [Economy -or- Convenient] refill
- Economy size
- Extreme Foam
- Fills -or- equal to [two] [2] 32 fl oz trigger[s] [sprays]§
- [Foam] attacks [mildew stains] deep down
- Foam holds -or- stays [long[er]] on tough mildew stains
- [Foam] penetrates soap scum -or- grime [and bleaches away stains]
- Foam Sticks to Mildew Stain[s]
- Foam option -or- setting
- Foam or spray
- Foaming action attacks [mildew stains] deep down [for a powerful clean]
- Foaming Action for a Powerful Clean
- Foaming action with bleach
- Foaming bleach action removes tough mold & mildew stains
- Foaming bleach action removes tough mold -and/or- mildew stains
- Foaming Bleach Action, Scrub Less***
- Foaming trigger [option -or- setting] for a deep clean
- Foaming trigger for control
- Get -or- Spray Every Drop[!]
- Just spray and wipe; no scrubbing required!
- Last Drop Access
- Lavender Scent
- Learn more at [Tilex.com] [CleanFreak.com] [proudtobeacleanfreak.com] [friendsofclean.com] [proudtoclean.com]
- Lemon Fresh Fragrance
- Lemon Fresh [scent]
- Leaves no residue
- Low price [compared to our previous 32 oz price]!
- Mama's got the magic of Clorox™
- More Savings, Less Waste[!][!]
- New -and/or- [Improved] Thicker Foam
- No Waste -or- Wasteless Bottle
- [Now] choose Foam or Spray
- Powerful clean with less scrubbing***
- Powerful Cleaning Foam
- Powerful foaming action to clean
- Sudsing -or- foaming action
- [Now] available in [this -or- a] convenient refill so you can reuse your trigger

Cleaning/Miscellaneous Claims continued

- [Over] [*insert* %] more for the same price [as the 32 oz]
- Plus [with] Clorox® Bleach
- Powers through soap scum -and/or- grime[!]
- Same [great] [Tilex] performance, [*insert* %] lower price [compared to our previous price]!
- Same [great] [Tilex] performance, now [*insert* %] cheaper [compared to our previous price]!
- Same [great] [Tilex] performance, now better value [compared to our previous price]!
- Saves a shopping trip††
- See it and believe it
- See the difference [Tilex makes]
- Six -or- 6 month supply[!]^{††}
- Smart Tube[®][™] Technology
- Thick Foam
- Two Ways to Clean

- Up to [a] 30% [discount] [cheaper] [free][!]*
- [Use as a] [Pourable] refill for this product -and/or- [multi-surface] cleaner
- [Value] [Economy] [Budget] size -or- refill
- [Value] [multi] [twin] pack
- Watch Tilex clean
- With bleach



* [when compared to] [vs.] 32 fl oz Tilex® trigger [spray] in most stores, based on average retail price -and/or- volume

*** mold & mildew stains

†† [when compared to] [vs.] purchasing one 32 fl oz Tilex® trigger spray

‡‡ 40% less plastic [when compared to] [vs.] [in comparison to] two -or- 2 32 fl oz Tilex® trigger sprays

§ of this product

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!
- Get rid of mold
- Got Mold? Kill [Destroy] [Eliminate] [Wipe out] [Remove] it with Tilex!
- Kills [99.9%] of germs†††
- Kills CA-MRSA**
- 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 mold[s] 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
- Kills -or- eliminates -or- destroys [99.9% of] flu virus††††
- 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!
- Mold Killer†
- 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) [ATCC 6538], Streptococcus pyogenes (Strep) [ATCC 9342], †Trichophyton mentagrophytes (Athlete's Foot Fungus) [ATCC 9533], †Aspergillus niger (mildew) [ATCC 6275] -or- [ATCC 16404], [Salmonella choleraesuis] -or- Salmonella enterica (Salmonella) [,Influenza A virus] [ATCC 10708], Pseudomonas aeruginosa (Pseudomonas) [ATCC 15442], †Penicillium chrysogenum (Penicillium) [ATCC 10106], †Alternaria alternata [ATCC 6663], †Cladosporium herbarum [ATCC 28987], †Mucor bainieri [ATCC 42642], Community Associated Methicillin resistant Staphylococcus aureus [CA-MRSA**] [NARSA NRS123] [Genotype USA 400] -or- CA-MRSA**, Community Associated Methicillin resistant Staphylococcus aureus [CA-MRSA**] [NARSA NRS384] [Genotype USA 300], Escherichia coli O157:H7 [ATCC 35150], ESBL (Extended Spectrum Beta Lactamase) producing Escherichia coli (ESBL producing E. coli) [ATCC BAA-196]
- 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.

** Community Associated Methicillin Resistant Staphylococcus aureus

††† Staphylococcus aureus [(Staph)], Salmonella enterica, Trichophyton mentagrophytes [(Athlete's Foot Fungus)] [,Influenza A virus]

†††† Influenza A virus

Pesticidal Claims continued

Pandemic 2009 H1N1 Influenza A virus***

Standard 2009 H1N1 Claims:

- Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. This product (**Product Name**) is a broad-spectrum hard surface disinfectant that has been shown to be effective against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).
- This product has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.
- This product has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).
- Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).
- Kills Pandemic 2009 H1N1 influenza A virus.

*** per Agency guidance dated October 22, 2009 "Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1 Influenza A Virus (formerly called Swine Flu)" www.epa.gov/oppad001/h1n1-guide.html

Alternate 2009 H1N1 Claims:

- Kills [2009] H1N1 [Flu Virus]
- Kills Germs -and/or- Flu Viruses [including [2009] H1N1]
- Kills [99.9%] of Germs including [2009] H1N1 [Flu Virus]
- Effective against [2009] H1N1 [Flu Virus]

For use with Formula A07 and foaming trigger:

- Attacks mildew at its roots
- 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]
- Penetrates to kill and destroy tough mold, mildew and bacteria at its source
- Penetrates to kill mildew in hard to clean places
- [Seeks out and] kills mildew at its roots
- This product has a penetrating foam that seeks out and kills mildew even in tile grout, caulking and corners
- With [Deep] [Penetrating] Foam

