UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Ms. J. Evelyn Lawson The Clorox Company c/o PS&RC PO Box 493 Pleasanton, CA 94566-0803

NOV 1 3 2002

Subject:

Spruce Ups

EPA Registration No. 5813-58 Amendment Date: May 9, 2002 EPA Receipt Date: May 20, 2002

Dear Ms. Lawson,

The following amendment submitted in connection with registration under FIFRA section 3(c)(7)(A) is acceptable with the conditions listed below.

• Update First Aid Statements

Conditions

Revise the label as follows:

- 1. According to the October 31, 2002 letter regarding the 6(a)2 failed efficacy studies, this product is efficacious as a hospital disinfectant when using a 4 minute contact time. You must revise the disinfection contact time to 4 minutes.
- 2. Revise the second statement for the sanitize and disinfection directions to read "use enough wipes for treated surfaces to remain visibly wet for"
- 3. Page 2: Under Antibacterial Claims, delete the claim, "Can help reduce the risk of spreading illness causing or harmful bacteria between hard, nonporous surfaces."
- 4. Page 2: Delete the following bullets that appear in the second column:
 - without spreading bacteria
 - opportunistic bacterial pathogens
 - 99.9% viruses
 - virus that causes the common cold
 - virus that causes the stomach flu
 - common flu virus

| | common cor | d virus | CONCURRENC | ŒS | | | |
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EPA Form 1320-1A (1400)

- diarrhea causing virus
- germs and bacteria from sneezing, coughing, touching
- Page 3: Data has not been submitted to support a disinfection or sanitization claim for toilets. You must either remove the common that separates the use sites, "exterior surfaces of urinals, and/or toilets" or delete the site "and/or toilets." Also, the surface, tile, must be qualified as hard, nonporous by stating "glazed" tile.
- 6. Page 3: Under general/cleaning claims, either delete the bullet, "after use, just toss wipes and bacteria away," or state "after use, just toss wipes away."

Acceptable Data

| Data Requirement | Means of Support | Status/ Toxicity Category | | |
|---------------------------|---------------------------------|---------------------------|--|--|
| Acute Dermal Toxicity | Submitted study, MRID 456809-01 | Acceptable/IV | | |
| Acute Inhalation Toxicity | Waiver Request | Waiver Acceptable | | |
| Primary Eye Irritation | Submitted study, MRID 456809-02 | Acceptable/ III | | |

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

Should you have any questions regarding this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely.

Velma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510C) Nute: Bold, italicized text is information for the reader and is not part of the label. [Bracketed information is optional text.]

<u>Underlined text is new.</u> Strike-through (404) means removed.



Pretreated with a special formula to clean, disinfect, and deodorize.

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional precautionary statements.

| ACTIVE INGREDIENTS: |
|---|
| n-Alkyl (C14, 60%; C16, 30%; C12, 5%; C18, 5%) |
| Dimethyl Benzyl Ammonium Chloride 0.145% |
| n-Alkyl (C12, 68%; C14, 32%) Dimethyl Ethylbenzyl |
| Ammonium Chloride |
| OTHER INGREDIENTS |
| Premoistened Wipes |

Canister and Refill:

TO OPEN PACKAGE: Lift flap on fid. Remove fid by lifting upward. Insert corner of center sheet through flap opening on fid. DO NOT push finger through opening; [your finger may become stuck]. Replace fid and pull sheet out at an angle. The next sheet pops up automatically. When finished, reseal by closing lid flap to retain moisture. To open refill pack tear at serrated edge. Remove wipes and place in canister.

For Canister:

TO OPEN PACKAGE: Flip open dispensing flap and remove lid by lifting upward. Pull up corner of CENTER SHEET, twist to a point, and thread through small opening in lid. DO NOT push finger through opening; (your finger may become stuck). Replace lid and PULL WIPE AT AN ANGLE, the next sheet pops up automatically. When finished, close lid flap to retain moisture.

Carton and Pouch:

TO OPEN PACKAGE: Lift flap on carton. Open pouch by peeling back seal. Use wipes as directed. Reseal pouch after each use.

Pouch inside carton:

Pull tab to open, reseal after each use.

For Tub and Refill.

TO OPEN PACKAGE: Flip open dispensing flap and remove lid by lifting upward. Place refill in tub. Open pouch by peeling back seal. Insert sheet through opening in lid. Replace lid. The next sheet pops up automatically. When finished, close lid flap to retain moisture.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

TO CLEAN: Wipe surface with a wipe; let air dry.

TO SANITIZE: Use to sanitize/deodorize hard, non-porous surfaces: wipe surface; wipe enough for treated surfaces to remain visibly wet for 30 seconds. Let surface dry. For highly soiled surfaces, clean excess dirt first.

TO DISINFECT (AND DEODORIZE): Use to disinfect hard, non-porous surfaces; wipe surface to be disinfected. Wipe enough for treated surface to remain visibly wet for 4 -or- 5 minutes. Let surface dry. For highly soiled surfaces, clean excess dirt first.

For surfaces that may come in contact with food a potable water rinse is required. These wipes will not harm most surfaces including acrylic, fiberglass and vinyl. Not recommended for use on unpainted wood or glass.

Not for cleaning or sanitizing skin. Do not use as a diaper wipe or for personal cleansing.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling

FIRST AID: If in eyes: Flush with plenty of water. Call a physician if irritation persists. If on skin: Wash with plenty of seap and water. Get medical attention if irritation excesses.

FIRST AID: It 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 for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for freatment. For further information, call (800) 227-1860.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

STORAGE/DISPOSAL

Canister

Dispose of wipe in trash after use. Do not flush. Tightly close lid between uses to retain moisture. Do not reuse empty container.

-or- Refill only with this product. Wrap container and discard in trash, or- Offer empty container for recycling. If recycling is not available discard container in trash.

Carton and Pouch:

Dispose of wipe in trash after use. Do not flush, Resear pouch between uses to retain moisture. Do not reuse empty container. Discard in trash.

Package made from $\pm \pm 2s$ post consumer recycled plastic if you have any questions or comments please call us toll free at: 1,800,001,1360

NOV 1 3 2002

Mfd. for & © 1997 The Clorox Company, Oakland, CA 94612 EPA Rag. No. 5813-58

EPA Est. No. 5813-MS-1, -CA-3, -CA-4 - GA-4 - 58455 IN-1 - 8251-WI-001, 56952-AR-001

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[Tested by an independent lab to...] [independently tested and found to...]

Antibacterial Claims:

- 30 second sanitization¹
- . Sanitizes in [just] 30 seconds1
- . Kills [bacteria] in [just] 30 seconds1
- . Can help reduce the risk of spreading illness causing -or- harmful bacteria between hard, non-porous surfaces
- . Can help reduce the risk of cross-contamination on treated surfaces
- . Can help reduce the risk of cross-contamination
- . Anti-bacterial -or- disinfecting wipes -or- [formula]
- . Moist with cleaners -and/or- disinfectants
- . Wet [household -and/or- disinfecting] wipes

ACCEPTED with COMMENTS in EPA Leter Dated:

NGV 1 3 2002 Under the Property Consecticide. Fundicion and Laborate Act as amended, for to recide, registered under EPA Reg. No.

5813-58

(Select any of the following)....

tollowed by (Can select any one or more of the following)

- . One step cleaning -and/or- disinfecting -and/or- deodorizing [of]
- . Disinfect -and/or- touch-up clean
- . Cleans -and/or- disinfects -and/ordeodorizes
- . [The product are] the quick and easy way to [touch-up clean] and disinfect
- Leaves hard, non-porous surfaces disinfected
- There are many uses for SPRUCE UPS and here are a few:
- bathroom surfaces
- kitchen surfaces
- kid's playroom or family den
- window blinds
- [Touch-up] Clean[s] and disinfect[s]
- . Use (the product) -or- [the wipes] to [disinfect] -and/or- [touch-up clean]
- . Disinfects in 4 -or- 5 minutes
- Kill[s] [99.9% of]
- · Remove(s)
- · Quickly removes
- · Effective against
- · Wipes away [dirt -and/or- dust]
- . That's because they wipe away [dirt] [and]
- · Removes/gets rid of grease/grime/soapscum/hard water stains/fingerprints/messes that kids leave behind
- . Kills 99.9% of bacteria in 30 seconds

- 99.9% of bacteria^{1 2}
- · Without spreading bacteria · Odor causing bacteria1?
- [Common] Household bacteria17
- · Household kitchen -or- bathroom bacteria'?
- . Bacteria that can cause foodborne illnesses! ?
- . Bacteria that cause odor
- . Bacteria that cause scum and slime on hard surfaces
- Opportunistic bacterial pathogens^{1,2}
- 99.9% of viruses3
- . The virus that causes the common colds
- . The virus that causes the stomach flut
- Influenza A2 virus
- · Rotavirus WA
- Common flu virus⁵
- Common cold virus⁵
- . Diarrhea-causing virus
- [Common] Household viruses³
- . Germs (and bacteria) from sneezing/ coughing/touching
- 1 Klebsiella pneumoniae, Staphylococcus aureus
- 7 Klebsiella pneumoniae, Staphylococcus aureus (Staph), Salmonella choleraesuis (Salmonella). Pseudomonas aeruginosa, Escherichia coli 0157:H7 (E. coli), Listeria monocytogenes (Listeria), Campylobacter jejuni, Streptococcus pyogenes
- 3 Rotavirus WA, Influenza A2
- 4 Rotavirus WA
- 5 Influenza A2

may be followed by (Select any one or more of the following)

- . On hard, non-porous [bathroom -and/orkitchen] surfaces
- . On household surfaces [everyday]
- . Throughout the house (kitchen and bathroom]
- · All over your house
- Anytime
- Daily
- Everyday
- · In one easy step
- Every time you wipe off a [household] surface
- In [just] 5 minutes
- · Everywhere -or- Anywhere

On hard, non-porous [kitchen -and/orbathroom -and/or- general use):

Counters, walls, shower walls, vinyl wall paper, tables, stovetops, sinks, cabinets, door knobs, faucets, floors, exterior surfaces of -or- outside surfaces of appliances; microwaves, refrigerators, washing machines, dryers, finished hardwood, changing tables, pet area surfaces, diaper pails, trash cans. [bath] tubs, chrome, exterior surfaces of urinals, and/or toilets, bathrooms, restrooms, public restrooms, tile, public -or- pay telephones, patio furniture. car interiors, computer keyboards, hand rails. light switches, door frames, desks, dining room surfaces and tables, fast food restaurant tables, grocery store carts, garages, basements, storage areas, laundry rooms, light switches, showers, hampers. tiled walls.

R0192-17

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General/Cleaning Claims:

- · Bleach-free [formula]
- Quick
- Easy
- Fast
- Convenient
- · For use at home or in public areas -or- places
- Regular [wipe] [size] -or- Large [wipe] [size]
- . For use while traveling
- · Rain Clean [Scent] -or- Fresh [Scent] -or- Lemon Fresh [Scent] -or-Floral Fresh [Scent]
- · Has [leaves] a clean -and/or-Light Fresh/Lemon/Rain Clean/Floral scent -or- fragrance -or- smell.
- . [The product -or- the wipes are] [always] ready to use
- . No [mixing -and/or- spraying -and/or- fuss -and/or- need to rinse]
- . Everything [you need] is already in the wipe
- . For [light] -or- touch-up daily -or- quick cleaning -or- clean-ups [in one easy step]
- Trial [size -or- pack] -or- Paper towel size [8.5"x11"]
- . Moist Household [Cleaning] Wipes
- . SPRUCE UPS are premoistened with a special cleaning formula to handle daily clean-ups without bottles, sponges, or buckets.
- . The convenient way to keep your home looking "just cleaned"
- [Use the product -or- the wipes] for [light] touch-up -or- light -orevery day -or- daily -or- quick cleaning -or- clean-ups [all over the house] [anytime] -or- [anywhere]
- . [Specially formulated] For [use in] the bathroom
- [Specially formulated] Use daily [to clean bathroom soils such as soap, soap scum, toothpaste, hair spray, hair get, cosmetics, shaving cream and hand and body lotion]
- · Leaves your bathroom fresh and clean
- . The easy way to touch-up clean your bathroom every day
- . Specially formulated to clean (a variety of surfaces) [throughout -orall over -or- around] the house -or- kitchen and bathroom
- . Specially formulated for a variety of surfaces -or- kitchen surfaces
- . The easy way to clean all over the house
- . The easiest way to keep your house clean everyday

- Travel [size -or- pack]
- . [Great] For traveling -or- For use at work -or- For use in public restrooms -or- For use on hard surfaces -or- For floor(s) [touch-ups] -or- For touch-up cleaning
- . Use [the product] -or- the wipe[s] throughout the house
- · Perfect for cleaning up around the toilet
- · Makes your job easier in the kitchen/bathroom
- Just pull, wipe clean and toss
- . After use, just toss wipe[s] and bacteria away
- · For Household Surfaces indoor and outdoor
- · Will not harm most surfaces
- · With a bleach free formula
- · With a pleasant fragrance
- · Does not contain bleach
- It's from Clorox, so it's more than clean
- · Clean with just a wipe -or- touch
- . For daily use

ACCEPTED with COMMENTS in EPA Letter Dated:

NOV 1 3 2002

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

5813-58

Packaging Claims:

- · Multi-refill pack
- Value pack
- · Refill pack
- Big size
- Value size
- · Perfect size for kitchens -or- bathrooms
- 40% Bigger quitted wipes*
- · Portable size
- Pop-up [top]
- · Easy pop [top]
- [With] Pop action • Pull 'n' go
- · Ready pull

*vs 7"X8" size

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