



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 16 2003

Eric Tamichi
Clorox Services Company
P.O. Box 493
Pleasanton, CA. 94566-0803

SUBJECT: March 19, 2003 Amendment Application
Clorox MTOC
EPA Registration 5813-76

Dear Mr. Tamichi:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comment(s) listed below.

1. The proposed use as a disinfectant with fungicidal activity against *Candida albicans* in the presence on hard, non-porous surfaces for a contact time of 10 minutes is not acceptable.
2. The proposed use as a sanitizer against *Staphylococcus aureus* and *Klebsiella pneumoniae* are acceptable.
3. A number of proposed label claims regarding the use of the product as a sanitizer [page 4 of the proposed label] could be misleading and must be changed accordingly.
 - "Has the power of Clorox [bleach] to kill 99.9% of [household germs -or- bacteria]", delete the word "power", and replace with "effectiveness".
 - "Kills [more than] 99.9% of [household] bacteria -or- germs", delete the wording "more than".
 - "kills 99.9% of household germs -or- bacteria with the power of clorox {bleach}, delete the wording "power" and replace with "effectiveness".
4. The proposed label claims that the product "kills ... germs ... in toilet bowl water." These claims should be revised to read "kills ... germs ... on hard nonporous toilet bowl surfaces." Toilet bowl water was not demonstrated by efficacy testing.

- 5. The claim for Rotavirus should be listed on page #3 of the proposed label under disinfecting claims only for 10 minutes. Also, the listing of Rotavirus under sanitization is not acceptable. On page #4, the bottom lower left panel under the sanitization claims, delete the label claim for "Rotavirus". On the right middle panel of page #4, the claim for sanitization of toilet bowl water in 5 minutes is not acceptable.
- 6. The use directions for under disinfection should be expanded to indicate that the product is to used be undiluted and that the usage is only for non-medical areas (i.e., homes, schools, etc.). You must revise label so that the label lists the major non-medical environments for usage (i.e., homes, schools) where toilet bowls can be disinfected with the product.
- 7. Since the data submitted *Candida albicans* were not acceptable, the claim for *Candida albicans* must be deleted from the left panel of page #3 label.
- 8. On page #4 of the proposed label, delete the wording "power", delete the virus "Rotavirus" on the left lower panel.
- 9. On the middle right panel on page #4, delete the phrase "germs in toilet bowl water."
- 10. On the middle left panel on page #4. delete the phrase "or germs or pathogens (in toilet and/or bowl water).
- 11. On lower left panel on page #4, delete "germs -or- bacteria-or- microorganisms in (toilet bowl water).
- 12. On the top of page #4, revise "To sanitize (toilet bowl)" to read "To sanitize (toilet bowl surfaces).
- 13. On the bottom left panel of page #2, the use of the term "new" is only acceptable for six(6) months. After six months and at the next label printing, delete the term "new".

See enclosed review for additional information regarding the performance data. A copy of your stamped conditionally acceptable label is enclosed. Please submit a revised finished label for our files. If you have any questions regarding this letter, please contact Tom Luminello of my staff at (703) 308-8075.

Sincerely yours,

Robert S. Brennis
 Product Manager (32)
 Regulatory Management Branch II
 Antimicrobial Division (7510-C)

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Note: **Bold, italicized text is information for the reader and is not part of the label.** (Bracketed information is optional text.)
Text separated by a diamond bullet (◆) denotes -and/or- options. Underlined text is new. Strike-through (del) means removed.
The terms "urinal or urinals" can be substituted or added where the terms "toilet or toilets" appear.

EPA Reg. No. 5813-76 Clorox MTOC Page 1 of 5

CLOROX[®] MTOC

ACCEPTED
with COMMENTS
In EPA Letter Dated:
SEP 16 2003

5813-76

KEEP OUT OF REACH OF CHILDREN DANGER: CORROSIVE

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

IN EITHER CASE, CALL A POISON CONTROL CENTER OR DOCTOR FOR TREATMENT ADVICE.

See back panel for additional precautionary labeling.

ACTIVE INGREDIENT:	
Sodium hypochlorite	1.6%
OTHER INGREDIENTS:	98.4%
TOTAL:	100.0%

NET Contents: 24 fl oz

487

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 The terms "urinal or urinals" can be substituted or added where the terms "toilet or toilets" appear.

DIRECTIONS FOR USE

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

CLEANING

To Clean [toilet bowl]:

- [1] Flush toilet before cleaning.
- [2] Apply product under and around rim to coat the inside of bowl.
- [3] Scrub entire bowl with a stiff brush and allow to sit for 5 minutes.
- [4] Do not allow pets or children to access the toilet during this time.
- [5] Flush toilet.

(Note that prolonged contact with metal, old porcelain or worn plastic laminate may cause discoloration. In addition, do not use with ammonia, as hazardous gases may be released.)

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5813-76

Cleaning Claims:

- For cleaner fresher toilet -or- bathroom
- Will not scratch surfaces
- Leaves bathroom -and/or- toilet [bowl] fresh and clean
- Freshens toilet bowl -or- bathroom
- Easy to use [for cleaning]
- Bleach in the bowl!
- Makes your [cleaning] job easier
- Has the [cleaning] power of bleach
- MTOC with bleach in a gel formula -or- In a unique bleach gel formula -or- Rain Clean -or- Fresh Scent -or- With power of Clorox® Bleach in a gel formula -or- gel formula -or- With the power of Clorox® Bleach in a convenient gel formula
- Contains sodium hypochlorite plus a cleaner
- Non-abrasive formula for cleaning -or- which will not scratch surfaces
- For [cleaning] use on both white and colored hard surfaces
- Thick Clorox® Bleach toilet bowl cleaner
- Contains the power of Clorox® Bleach in a gel formula that coats the bowl [better] for a deep down cleaning in -or- around the bowl
- Brightens and removes dirt stains
- Brightens and whitens your bowl
- Brightens with the power of Clorox® bleach
- Whitens with the power of Clorox® bleach
- Leaves [the] [your] [toilet] bowl bleach-clean!
- Leaves the bowl bleach-fresh
- Keeps [the] [your] toilet [bowl] bleach-clean
- Helps keep [the] [your] toilet [bowl] fresh and clean
- Helps keep [the] [your] toilet [bowl] clean, clear, and free of odor
- Cleans -and/or- deodorizes
- Cleans -and/or- freshens
- Cleans -and/or- deodorizes with the power of [Clorox®] bleach
- The only manual toilet bowl cleaner with the power of Clorox® [bleach]
- Clorox® [bleach] cleaning power
- Effectiveness -or- Power of [Clorox®] bleach with a clean, fresh scent
- Contains a powerful cleaner plus [Clorox®] bleach
- Contains cleaners plus powerful Clorox® Bleach
- Leaves toilet surfaces [clean and] sanitary
- An effective cleaner for use in the toilet -or- on toilet surfaces
- Better cleaning power -or- formula
- Has the cleaning power of bleach
- For a cleaner, fresher toilet
- Manual -or- Bleach toilet bowl cleaner
- Removes stains and leaves bowl sanitary

GENERAL CLAIMS

delete

- ~~• [New] Rain Clean -or- Fresh Scent~~
- ~~• [New][and][Improved] Formula~~
- Pleasant fragrance
- Has a clean fresh scent -or- fragrance
- Concentrate -or- Concentrated formula
- Contains no abrasives -or- acids
- Won't splash or drip and will rinse away easily
- Fully dissolves [in the bowl water] - no messy residue to remove
- Non-abrasive formula [that will not scratch surfaces]
- Removes odors
- Deodorizes and has a clean, fresh scent -or- fragrance
- Great for toilets
- Clings to sides of bowl better
- [New] Improved clinging action
- Thick formula
- Cleans and deodorizes the toilet bowl [water]
- Removes -or- Prevents -or- Eliminates odors
- Commercial Solutions
- Will not harm plumbing or septic systems
- Thick gel formula coats the bowl and dissolves stains for deep-down cleaning
- Thick gel formula coats the bowl for deep-down cleaning
- With clinging action

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EPA Reg. No. 5813-76 Clorox MTOC Page 3 of 5

DISINFECTION

To Disinfect [toilet bowl]:

- [1] Start with a clean bowl -or- Preclean before disinfecting.
- [2] Empty bowl water.
- [3] Apply product under and around rim to coat the inside of bowl.
- [4] Scrub entire bowl with a stiff brush and allow to sit for 5 minutes -or- 10 minutes.
- [5] Do not allow pets or children to access the toilet during this time.
- [6] Flush toilet.

(Note that prolonged contact with metal, old porcelain, or worn plastic laminate may cause discoloration. In addition, do not use with ammonia, as hazardous gases may be released.)

Use Clorox undiluted in homes, schools, ~~etc~~ And other non-medical locations.

Disinfecting Claims:

5-Minute Contact Time:

- Kills [common] organisms[: Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] -and/or- Rotavirus [in 5 minutes]]
- A toilet product for cleaning and disinfecting [against Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] -and/or- Rotavirus in 5 minutes] *delete*
- Disinfects [and cleans] toilet [bowl] surfaces [against Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] -and/or- Rotavirus in 5 minutes] *delete*

10-Minute Contact Time:

- Kills [common] bacteria[: Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] [in 10 minutes] -and/or- Escherichia coli [E. coli] -and/or- Rotavirus [in 10 minutes]]
- A toilet product for cleaning and disinfecting [against Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] -and/or- Escherichia coli [E. coli] -and/or- Rotavirus in 10 minutes]
- Disinfects [and cleans] toilet [bowl] surfaces [against Staphylococcus aureus [Staph] -and/or- Salmonella choleraesuis [Salmonella] -and/or- Escherichia coli [E. coli] -and/or- ~~Candida albicans~~ -and/or- Rotavirus in 10 minutes] *delete*

General Disinfecting Claims:

- Kills bacteria -or- germs while it cleans [and disinfects]
- Kills odor-causing bacteria[: Salmonella choleraesuis -and/or- Staphylococcus aureus -and/or- Escherichia coli] in the toilet bowl
- Antibacterial [formula] -or- Disinfecting [formula]
- This product kills Salmonella choleraesuis, Staphylococcus aureus, and Escherichia coli found in the toilet -or- on the toilet
- Bacteria-fighting -or- Germ-fighting formula
- Disinfects [and cleans your toilet] [against Salmonella choleraesuis, Staphylococcus aureus, and Escherichia coli]
- Toilet disinfectant [and cleaner]
- Broad spectrum disinfectant -or- disinfectancy cleaner
- Fast acting toilet disinfectant -or- toilet cleaner
- [Effective] toilet disinfectant [in presence of [5%] soil load -or- organic soil]
- Bactericide -or- Bactericidal -or- Virucide -or- Virucidal -or- Germicide -or- Germicidal
- This cleaner disinfectant combines cleaning and disinfecting
- Disinfects under the rim
- Eliminates odors caused by bacteria -or- germs -or- Controls odors produced by [common] [toilet] germs

- Kills odor-causing bacteria
- Antibacterial [formula -or- action]
- Germ-fighting [formula]
- Toilet disinfectant -and/or- cleaner
- Bleach toilet disinfectant [-and/or- cleaner]
- Disinfecting bleach cleaner [for toilets]
- A bleach product for toilet cleaning and disinfecting
- Disinfects nonporous [hard][solid] surfaces of toilet bowls
- This product cleans and disinfects simultaneously
- Disinfects against -or- Kills [common] toilet bacteria -or- germs [: Salmonella choleraesuis [Salmonella] -and/or- Staphylococcus aureus [Staph] -and/or- Escherichia coli [E. coli] -and/or- Rotavirus]
- Disinfects -and/or- Deodorizes [against odor-causing bacteria -or- germs]
- Disinfects and deodorizes by killing [common] [toilet] germs and controlling their odors
- Kills the virus that causes common colds[: Rotavirus]
- Kills -and/or- Disinfects Rotavirus

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SEP 16 2003

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SANITIZATION

To Sanitize [toilet bowl]:

- [1] Start with a clean bowl. -or- Preclean before sanitizing.
[To open, simply twist cap counterclockwise one-quarter turn. Cap does not come off.]
[Lower bottle so cap is below rim.]
- [2] Wet all surfaces of bowl interior, including sides of bowl and under the rim, with at least 4 fl oz of liquid. -or- Apply product under and around rim to coat [the] inside of bowl.
- [3] Scrub entire bowl with a stiff brush and allow to sit for 5 minutes.
- [4] [Do not allow pets or children to access the toilet during this time.]
- [5] Flush toilet. [Rinse brush in fresh water after use.] [Close cap after each use.]
(Note that prolonged contact with metal, old porcelain or worn plastic laminate may cause discoloration. In addition, do not use with ammonia, as hazardous gases may be released.)

Sanitization Claims:

- A bleach product for toilet [bowl] cleaning and sanitizing
- Also kills 99.9% of *Klebsiella pneumoniae* [Kleb] and *Staphylococcus aureus* [Staph]
- An effective sanitizer [for use in the bathroom toilet]
- [Bleach] Toilet [bowl] sanitizer
- Cleans and kills 99.9% of germs
- Cleans, kills 99.9% of germs -or- sanitizes and freshens with the power of Clorox® bleach
- Cleans, sanitizes -or- kills 99.9% of germs, and deodorizes
- [Cleans,] [whitens,] [brightens] and sanitizes -or- kills 99.9% of germs
- Germ-fighting formula
- Has the power of Clorox® [bleach] to kill 99.9% of [household] germs -or- bacteria
- In-bowl sanitizer
- Kills (more than) 99.9% of [household] bacteria -or- germs
- Kills (more than) 99.9% of [household] bacteria -or- germs -or- pathogens [in toilet -and/or- bowl water]
- Kills 99.9% of [common] [household] [odor-causing] bacteria: *Klebsiella pneumoniae* -and/or- *Staphylococcus aureus* [Staph] [in 5 minutes] -and/or- Rotavirus [in 5 minutes]
- Kills 99.9% of [household] germs -or- bacteria -or- microorganisms [in toilet bowl water]
- Kills 99.9% of germs as it cleans
- Kills 99.9% of household germs -or- bacteria with the power of Clorox® [bleach]
- Kills 99.9% of the following organisms [in 5 minutes]: *Klebsiella pneumoniae*, *Staphylococcus aureus* and Rotavirus
- Kills germs while it cleans [and sanitizes]
- Kills (more than) 99.9% of [household] bacteria -or- germs [in toilet bowl water]
- Kills odor causing bacteria -or- germs in the toilet
- Leaves [toilet] surfaces sanitized
- Leaves toilet [bowl] sanitary
- [Removes stains and] leaves bowl sanitary -and/or- sanitized
- Removes tough stains and kills 99.9% of germs
- Sanitizer [for toilet use]
- Sanitizes [toilet -or- bowl] surfaces [in 5 minutes]
- Sanitizes in 5 minutes
- Sanitizes -or- Kills odor-causing bacteria [: *Klebsiella pneumoniae* -and/or- *Staphylococcus aureus*]
- Sanitizes toilet surfaces against [common] toilet germs
- Sanitizes toilet surfaces and bowl water [in 5 minutes]
- Sanitizes under the rim
- Sanitizes while it cleans
- Sanitizing [formula] -or- Antibacterial [formula]
- Sanitizing bleach cleaner for toilets
- This product cleans and sanitizes simultaneously
- This product combines cleaning and sanitizing
- This product is a sanitizer for bowl surfaces [against *Klebsiella pneumoniae* and *Staphylococcus aureus*]
- This product kills 99% of *Staphylococcus aureus* [Staph] and *Klebsiella pneumoniae* [Kleb], common bacteria found on toilet surfaces
- Unique gel formula cleans and kills 99.9% of germs -or- sanitizes with the power of Clorox® bleach
- Removes stains and leaves toilet bowl sanitized

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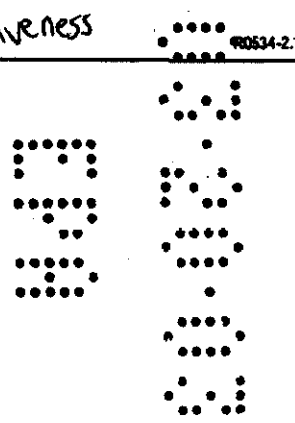
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ENVIRONMENTAL CLAIMS

- Contains biodegradable cleaning agents -and/or- cleaners -and/or- surfactants -and/or- soaps and detergents
- The bleach in this product breaks down almost entirely to salt and water -and/or- This bottle is made of ___% post-consumer recycled [HDPE] plastic -and/or- [This product is] [S]uitable for septic [systems] -and/or- wastewater systems -or- treatment plants
- Not harmful to plumbing and septic systems
- or- Safe for [plumbing and] septic systems

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: CORROSIVE.

May cause severe irritation or damage to eyes and skin. Protect eyes when handling. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. For sensitive skin or prolonged use, wear gloves. Wash after contact with product. Use only in well-ventilated areas.

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.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

IF SWALLOWED: Call a 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. **IN ALL CASES,** call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Clorox Information Line: 1-800-XXX-XXXX

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

Physical and Chemical Hazards:

This product contains bleach. Do not use or mix with other household chemicals such as other toilet bowl cleaners, rust removers, acids or products containing ammonia. To do so will release hazardous, irritating gases. Avoid contact with clothes, fabric, carpet, wood, painted and paper surfaces.

Storage and Disposal: Store in a location inaccessible to children. Tightly close cap between uses. Do not reuse empty container. Offer empty container for recycling. If recycling is not available, discard container in trash.



Mfd. for & ©2001 The Clorox® Company,
Oakland, CA 94612
EPA Reg. No. 5813-76
EPA Est. No. 5813-GA-01
(Actual EPA Est. No. in code below.)

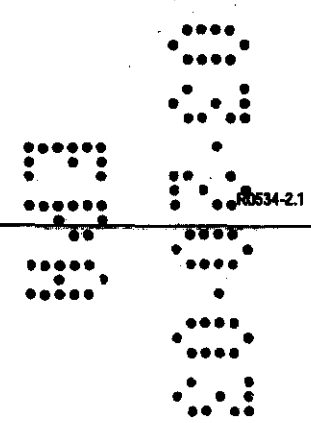
ACCEPTED
with COMMENTS

In EPA Letter Dated:

SEP 16 2003

Insecticide,
Pesticide Act as
Fungicide,
EPA Reg. No.

5813-76



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