

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

February 8, 2005

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

Subject: Clorox Patch
EPA Registration No. 5813-80
Application Date: November 9, 2004
Receipt Date: November 10, 2004

Dear Ms. Martinez:

This submission is to inactivate the May 17, 2004 final printed label located on the Agency PPLS system. The final printed labels were reviewed and accepted with comments.

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

Conditions

1. Remove claim Kills 99.9% of odor causing [household] germs from the label. The public health claims and non public health claims must appear separately on the label.
2. The Cleaning, Deodorizing, Stain Removal, Prevention Claims section makes contradictory claims:
 - Cleans: Easily cleans tough bathroom dirt like soap scum [and leaves surfaces shiny]
 - Leaves no residue -or- surfaces shiny

Please indicate which marketing claim is correct.

CONCURRENCES							
SYMBOL	75706						
SURNAME	Mitchell						
DATE	2-8-05						

General Comments

A stamped copy of the labeling accepted with conditions 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,

Emily H. Mitchell
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

Note: **Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text.]
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ACCEPTED
with COMMENTS
EPA Letter Dated:

FEB - 8 2005



Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 5813-80

PATCH

KEEP OUT OF REACH OF CHILDREN

CAUTION:

[DO NOT MIX WITH BLEACH-CONTAINING PRODUCTS]

SEE BACK LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Active Ingredient:
Glycolic Acid 1.50%
Other Ingredients: 98.50%
Total: 100.00%

NET CONTENTS _____

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Causes moderate eye irritation. Avoid breathing spray mist and use only in well-ventilated areas. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling.

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 further 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.]

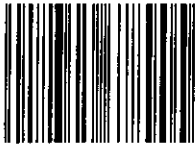
PHYSICAL OR CHEMICAL HAZARDS: Do not [use or] mix with bleach-containing products or with other bathroom ~~-or-~~ restroom or [household] cleaners. To do so may [will] release hazardous gases.

STORAGE AND DISPOSAL: Keep container closed. Store in the original container in an area inaccessible to children and pets. Offer empty container for recycling. If recycling is not available, discard container in trash.

[If you have any] questions or comments [?] [.]
[please call [us] toll free [at -or- :]1-800-227-1860[.]
[or] visit us at www.cloroxbathroomcleaners.com.]
Package made from ___% post-consumer recycled plastics.

Teflon® is a registered trademark of E.I. duPont de Nemours and Company used under license by The Clorox Company. Mfd. for & ©2002 The Clorox Company, Oakland, CA 94612 Clorox is a registered trademark of The Clorox Company. Made in the U.S.A. PATENT PENDING.

Contains no phosphorus.
EPA Reg. No. 5813-80
EPA Est. No. 5813-GA-01, 5813-CA-03, 58455-IN-01
(Actual EPA Est. No. in code above or below.) ~~-or-~~
(Actual code is shown above or below.)
Visit us at www.clorox.com



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BACK PANEL**DIRECTIONS FOR USE**

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

[Avoid breathing spray mist and use only in well-ventilated areas.]

Always stand on a non-slip surface when in the shower or [bath]tub.

To Clean and Deodorize:

1. Rotate nozzle to SPRAY or FOAM position.
2. Spray 6 to 8 inches from surface to be cleaned. Coat surface evenly and allow product to penetrate dirt and soap scum. As the formula breaks down bathroom -or- restroom grime, the Teflon® Surface Protector helps prevent new grime from sticking.
3. Wipe with a wet sponge or cloth, or rinse with water. [For tougher jobs] wipe with a [wet] [scrubby] sponge -and/or- cloth -and/or- brush -and/or- abrasive pad[s] -and/or- [cleaning] tool[s] -and/or- cleaning devices -and/or- scouring pad -and/or- [appropriate] [cleaning] tool -and/or- [[simply rinse with water].]
4. For best results, repeat regularly to maintain Teflon® Surface Protector.

To Disinfect: Thoroughly clean the surface to be disinfected by following the above directions [remove excess dirt first in heavily soiled areas]; reapply, spraying entire surface until completely wet. Let stand 10 minutes before wiping.

To Sanitize: Thoroughly clean the surface to be sanitized by following the above directions [remove excess dirt first in heavily soiled areas]; reapply, spraying entire surface until completely wet. Let stand 30 seconds before wiping.

To inhibit mold and mildew growth on hard, nonporous surfaces: Spray precleaned surface thoroughly, let stand 10 minutes before wiping. Reapply as necessary for ongoing -or- continual control.

FRONT OR BACK PANEL**Cleaning, Deodorizing, Stain Removal, Prevention Claims:**

- An invisible [armor] shield for [the] [your] bathroom -or- restroom
- Best on soap scum
- Bleach Free
- [Citrus] [Fresh] [Lemon] [Meadow Fresh] [Rain Clean] [Spring Mist] scent
- Cleans: Easily cleans tough bathroom dirt like soap scum [and leaves surfaces shiny]
- Cleans, freshens, shines and protects
- Cleans without bleach[ing] -or- Contains no bleach -or- Bleach free
- Commercial Solutions®
- Convenient and easy to use
- Convenient spray/foam trigger
- Cuts through -and/or- cleans tough soap scum [fast]
- [Deodorizes:] leaves a clean, fresh -or- lemon -or- citrus -or- meadow fresh -or- rain clean -or- spring mist scent
- Easily removes tough bathroom -or- restroom grime like soap scum
- Easy to use
- For a [cleaner, fresher] [non-stick] bathroom -or- restroom
- Freshens [the] [your] bathroom -or- restroom
- Helps keep [the] [your] bathroom -or- restroom clean and fresh between cleanings
- [Helps] Keep[s] [tough] grime from sticking
- [Helps] Prevent[s] [tough -and/or- new] grime from sticking
- Keeps bathroom -or- restroom grime from sticking
- Keeps surfaces cleaner [between cleanings] [longer]
- Leaves no residue -or- surfaces shiny
- Makes cleaning easier
- Makes surfaces sparkle -and/or- sparkling clean
- Not harmful for most surfaces
- Nothing's tougher on tough soap scum
- [Patch] has the cleaning power from -and/or- effectiveness of Clorox® that easily removes tough bathroom or restroom grime like soap scum
- Patent pending
- Prevents buildup so you don't have to clean as often
- Protects against buildup of bathroom -or- restroom grime -and/or- soap scum
- Protects against soap scum for up to 10 showers
- Removes odors -or- Deodorizes
- Removes tough [soap scum] [dirt] [bathroom -or- restroom grime]
- Repels bathroom grime
- Repels -or- prevents -or- protects against [unsightly] mold and mildew stains
- Soap scum melts away
- Starts to work immediately -and/or- before you start to wipe
- Stays cleaner longer [so it's easier to clean next time]
- The cleaning power -and/or- effectiveness of Clorox®
- The cleaning power of Clorox®
- [This product] will -or- does not leave a dull residue
- [Tough] Bathroom -or- Restroom grime won't stick
- Tough on grime -and/or- soap scum -and/or- dirt
- Water, dirt and soap scum just sheet away!
- Won't scratch bathroom -or- restroom surfaces -or- Non-abrasive
- You can see it clean -and/or- remove soap scum -and/or- remove bathroom grime before your eyes
- You can see soap scum melt away

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FRONT OR BACK PANEL CONTINUED

Teflon® Related Claims:

- A protective coating ~~-or-~~ barrier against soap scum
- Clean less often
- For best results use regularly -and/or- repeat periodically to maintain Teflon® Surface Protector ~~-or-~~ protective barrier
- Has invisible Teflon® Surface Protector so new bathroom ~~-or-~~ restroom grime doesn't stick
- Has the cleaning power from Clorox™ that easily removes tough bathroom ~~-or-~~ restroom grime like soap scum
- Invisible Teflon® Surface Protector repels and protects against future buildup
- Keeps grime from sticking on tubs, showers, tiles, sinks
- Keeps [the] [your] bathroom ~~-or-~~ restroom cleaner longer [use after use]
- [Lays down] A protective [barrier] [coating] against [soap scum] [bathroom ~~-or-~~ restroom grime]
- Lays down a protective stain barrier with Teflon® Surface Protector
- Lays down an invisible [molecular] barrier with Teflon® Surface Protector that repels [soap scum] [and] [tough] [bathroom ~~-or-~~ restroom] grime [and protects against buildup]
- Less build-up even after 10 showers
- [No other bathroom ~~-or-~~ restroom cleaner has] The cleaning power of Clorox™ plus the protecting power of Teflon® Surface Protector
- Protects your bathroom ~~-or-~~ restroom with an invisible armor shield
- Repels dirt: Invisible Teflon® Surface Protector keeps dirt from sticking so your bathroom stays cleaner longer.
- Repels tough bathroom ~~-or-~~ restroom grime like soap scum so it won't stick
- Repels tough soils like bathroom ~~-or-~~ restroom grime, dirt and soap scum [so they don't stick]
- Revolutionary formula gets [the] [your] bathroom ~~-or-~~ restroom clean with the power from Clorox™ and [helps] keep it clean with the power of Teflon® Surface Protector because new [dirt] [grime] [stains] [doesn't] [don't] stick
- Revolutionary formula made with Teflon® Surface Protector lays down a protective barrier to prevent soap scum and bathroom ~~-or-~~ restroom grime from building up
- Revolutionary formula with Teflon® Surface Protector to help keep [the] [your] bathroom ~~-or-~~ restroom cleaner longer by preventing buildup of tough bathroom ~~-or-~~ restroom grime like soap scum
- Revolutionary new 2-in-1 formula cleans and protects so [the] [your] bathroom ~~-or-~~ restroom stays cleaner longer [use after use]
- Teflon® Surface Protector prevents stains with an invisible protective [barrier] [coat of armor] [coating] [layer] [shield]
- The only bathroom ~~-or-~~ restroom cleaner with Teflon® Surface Protector [, a revolutionary, invisible, protective shield]
- [The] [Your] Bathroom ~~-or-~~ Restroom stays cleaner longer [use after use]
- This product keeps [the] [your] bathroom ~~-or-~~ restroom cleaner longer by preventing the buildup of tough bathroom ~~-or-~~ restroom grime like soap scum
- To clean and protect [your toilet bowl] [toilet bowls] [and urinals], use this product
- [Water] [Dirt] [Soap scum] [Bathroom ~~-or-~~ Restroom grime] will just sheet away
- Wow! Keeps dirt from sticking [all over your bathroom]!

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Pesticidal Claims:

- A bathroom ~~-or-~~ restroom product for cleaning and disinfecting
 - Antibacterial [formula] ['] ~~-or-~~ Disinfecting [formula] [*]
 - Bacteria-fighting ~~-or-~~ germ-fighting formula[*]
 - Bactericide ['] ~~-or-~~ Bactericidal ['] ~~-or-~~ Germicide[*] ~~-or-~~ Germicidal[*]
 - Bathroom ~~-or-~~ restroom [disinfectant] [cleaner] [sanitizer]
 - Broad spectrum disinfectant ~~-or-~~ disinfectant cleaner
 - Cleans and disinfects
 - Cleans and sanitizes
 - Cleaning and disinfecting power ~~-and/or-~~ effectiveness of Clorox®, so your bathroom is free of grime you can see and germs you can't*
 - Cleans bathroom grime and disinfects
 - Cleans, disinfects, and sanitizes
 - Cleans and disinfects for a pure clean [bathroom]
 - Disinfects and cleans [the] [your] bathroom ~~-or-~~ restroom
 - Disinfects and cleans [the] [your] bathroom ~~-or-~~ restroom against [household] germs[*]
 - Disinfects and cleans [the] [your] bathroom ~~-or-~~ restroom [against Salmonella choleraesuis and Staphylococcus aureus]
 - Disinfects ~~-or-~~ Sanitizes [bathroom ~~-or-~~ restroom surfaces]
 - [Effective] Bathroom ~~-or-~~ Restroom disinfectant ~~-and/or-~~ sanitizer [and cleaner] [in presence of soil load]
 - Eliminates ~~-or-~~ removes odors caused by bacteria
 - [Germs] [Bacteria] [Viruses] can cause illness. This product kills [these] [germs*] [bacteria] ['] [viruses]
 - Kills [99.9% of] bacteria¹
 - Kills 99.9% of germs[*]
 - Kills 99.9% of Klebsiella pneumoniae (Kleb) ~~-and/or-~~ Staphylococcus aureus (Staph)
 - Kills 99.9% of odor causing [household] germs* and leaves a fresh scent
 - Kills bacteria [']
 - Kills bacteria['] while it cleans
 - Kills [common ~~-or-~~ household] bacteria: Staphylococcus aureus (Staph) ~~-and/or-~~ Salmonella choleraesuis (Salmonella) [in 10 minutes]
 - Kills germs[*]
 - Kills germs and viruses [*]
 - Kills [household] germs[*]
 - Kills viruses
 - [Patch] has the cleaning power ~~-and/or-~~ effectiveness of Clorox® to clean and disinfect
 - [Patch] has the power of Clorox® to clean tough bathroom grime and kill bathroom germs[*]
 - Salmonella choleraesuis and Staphylococcus aureus are common [household] bacteria found in the bathroom ~~-or-~~ restroom. This product kills these bacteria in the bathroom ~~-or-~~ restroom.
 - Sanitizes [against Klebsiella pneumoniae (Kleb) ~~-and/or-~~ Staphylococcus aureus (Staph)]
 - This cleaner disinfectant combines cleaning, disinfecting, and stain repellency in one product
 - [This product] Kills Staphylococcus aureus (Staph), Salmonella choleraesuis (Salmonella), Pseudomonas aeruginosa (Pseudomonas), Influenza A virus (Hong Kong), Rhinovirus Type 37 (viruses that cause colds and flus), Rotavirus, Respiratory syncytial virus, Escherichia coli (E. coli), Enterococcus faecalis
 - Virucide ~~-or-~~ Virucidal
- * Enterococcus faecalis, Escherichia coli, Pseudomonas aeruginosa, Salmonella choleraesuis, Staphylococcus aureus, Influenza A virus, Respiratory syncytial virus, Rhinovirus Type 37, and Rotavirus.
- ['] Staphylococcus aureus (Staph), Salmonella choleraesuis (Salmonella), Pseudomonas aeruginosa (Pseudomonas), Escherichia coli (E. coli), Enterococcus faecalis.

This product is a sanitizer on hard, non-porous, non-food contact surfaces for a contact time of 30 seconds at full strength.

This product is a disinfectant against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load for a contact time of 10 minutes at full strength: Enterococcus faecalis, Escherichia coli, Influenza A virus (Hong Kong), Pseudomonas aeruginosa, Respiratory syncytial virus, Rhinovirus Type 37, Rotavirus, Salmonella choleraesuis, Staphylococcus aureus.

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FRONT OR BACK PANEL CONTINUED**Mildew Control Claims:**

- Inhibits **-or-** controls [the] growth of mold and mildew
- Prevents mold and mildew growth
- This product is mildewstatic and will effectively inhibit the growth of mildew and the odors caused by mildew when applied to hard, nonporous surfaces

Surfaces for Disinfecting and Cleaning:

Use [this product] on the following [washable] hard, nonporous [bathroom -or- restroom] surfaces[*]:

- | | | |
|---|---|--|
| <ul style="list-style-type: none"> • Baby furniture (cribs, changing tables) • Bathroom -or- restroom surfaces • Bathtubs • Cabinets • Chairs • Chrome • Countertops -or- Counters • Diaper pails • Doorknobs • Enamel • Fiberglass • [Glass] Shower[s] [doors] [walls] • Glazed [bathroom -or- restroom] tiles • Glazed ceramic [tile(s)] • Glazed porcelain [tiling] • Hard Plastic • Hard vinyl • Highchairs (non-food contact areas) | <ul style="list-style-type: none"> • Kitchen Appliance[s] exteriors • Light fixtures • Metal blinds • Microwave oven[s] exteriors • Mirrors • Oven doors • Plastic laundry hampers -or- baskets • Range hoods • Refrigerator[s] exteriors • Sinks [and fixtures] • Stainless steel or metal surfaces in bathrooms -or- restrooms and kitchens • Stove tops • Synthetic marble • Tables • Telephones • Toilet[s] exteriors • Tubs | <ul style="list-style-type: none"> • Urinal[s] exteriors • Washable kitchen surfaces • [Washable] Walls • Window[s] [sills] <p>[*] Do not use on natural marble, brass or varnished wood; for all other surfaces, spot test in an inconspicuous area. -or- spot test all other surfaces in an inconspicuous area.</p> <p>Not for use on floors. [Do not use on floors.] [Do not use to clean floors.] May cause slipperiness.</p> <p>Not for use on cookware.</p> |
|---|---|--|

Easily removes [the following] **-or-** Easily cleans [the following]:

- | | | |
|--|--|---|
| <ul style="list-style-type: none"> • Basin -or- sink ring • Bath oils • Bathroom -or- restroom tub -or- bathtub ring • Body oils | <ul style="list-style-type: none"> • Dirt • Grime • Hard water [marks] [deposits] [buildup] • Lipstick [marks] • Makeup | <ul style="list-style-type: none"> • Shampoo [buildup] • Soap [scum -or- buildup] • Toothpaste [buildup] |
|--|--|---|

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