

5813-86

07/31/2006

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

July 31, 2006

OFFICE OF PREVENTION,
PESTICIDES AND TOXIC
SUBSTANCES

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

Subject: CBW
EPA Registration No. 5813-86
Application Date: April 10, 2006
Receipt Date: April 11, 2006

Dear Ms. Lawson:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended to change this product from a limited disinfectant to a broad spectrum disinfectant, is accepted with conditions.

1. Change *Salmonella choleraesuis* to *Salmonella enterica*. The species name of this organism has been changed by ATCC. This change is effective immediately, and should be used for all subsequent references to this organism in the future.
2. The acceptance of the data to support a label claim for Human Coronavirus does not support a label claim for the product as an effective disinfectant against the causative agent of Severe Acute Respiratory Syndrome (SARS).
3. Revise the proposed label to include adequate dosage recommendations and complete directions for use of the product as a deodorizer.
4. Change "limited disinfectant" to "broad spectrum disinfectant" under the directions for use for disinfection claims.
5. The recommended maximum surface area to be treated must be included on the label.

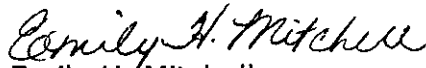
6. Remove the misleading "_____%" free from the proposed promotional language section. The language could appear as 100% free of a specific organism or 10% free.

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 call Wanda Henson at (703) 308-6345.

Sincerely,



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

Note: **Bold, italicized text is information for the reader and is not part of the label.**
[Bracketed information is optional text.] Underlined text is new. Strike-through (~~text~~) means removed.

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CBW

KEEP OUT OF REACH OF CHILDREN.

CAUTION: EYE IRRITANT.

See back -or- side panel for additional precautionary statements.

Questions or comments? Please visit us at www.bathwand.com or call us toll-free at 1-866-255-4105.

EPA Reg. No. 5813-86, EPA Est. No. _____
Mfd. for & © 2004 The Clorox Company, Oakland, CA 94612.
Clorox is a registered trademark of The Clorox Company. Patents pending.
Actual EPA Est. No. in code above -or- below -or- bottom -or- on side -or- to right -or- to left
Assembled in Mexico -or- Made in the U.S.A. -or- Made in China -or- Assembled in China
Contains no phosphorus.

Active Ingredient:	
Glycolic Acid	11.185%
Other Ingredients:	88.815%
Total:	100.000%

Net Contents _____

R0646-3 1

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JUL 3 1 2006

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **5813-86****

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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 and before eating and drinking [, chewing gum, -and/or- chewing tobacco.]

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. Call a poison control center or doctor for treatment advice.

PHYSICAL AND CHEMICAL HAZARDS: Do not mix with bleach-containing products or with other bathroom or household cleaners. To do so may release hazardous gases.

STORAGE AND DISPOSAL:

STORAGE: Store product in a cool, dry place and out of the reach of children.

DISPOSAL: Dispose of used cleaning pads in a trash bin inaccessible to children and pets. [DO NOT FLUSH.] [Offer empty container -or- carton for recycling. If recycling is not available, discard in trash.]

Not for personal use

PACKAGING NOTES:

This product will be available in many executions including a "Starter Kit." In instances where the cleaning pads are enclosed in another package, the following label elements will be included on the exterior package:

Front Panel:

- The product's name(s)
- Keep out of Reach of Children
- Referral to first aid instructions -or- statement
- Net content statement
- The ingredient statement

Back/side/top/and/or bottom panel(s)

- First Aid Statement
- Directions for use or referral to read product label for use directions
- Directions for assembly of tool.
- EPA registration number
- EPA Est. number for the final packer.
- The company name and address: Mfd. for -or- Mfd. by -or- Dist. by Clorox

CBW REFILL INNER POUCH:
CBW Refill

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 and before eating and drinking [, chewing gum, -and/or- chewing tobacco.]

FIRST AID:

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PHYSICAL AND CHEMICAL HAZARDS: Do not mix with bleach-containing products or with other bathroom or household cleaners. To do so may release hazardous gases.

STORAGE AND DISPOSAL:

STORAGE: Store product in a cool, dry place and out of the reach of children.

DISPOSAL: Dispose of used cleaning pads in a trash bin inaccessible to children and pets. [DO NOT FLUSH.] [Offer empty container -or- pouch -or- wrapping -or- film for recycling. If recycling is not available, discard in trash.]

Not for personal use

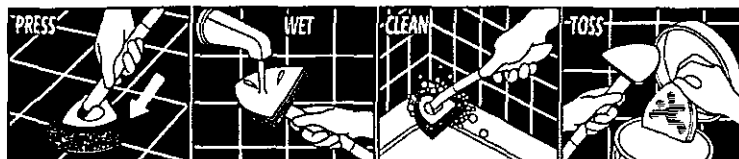
ATTACH HEAD TO FLUFFY SIDE OF PAD.

DO NOT ATTACH TO THIS SIDE.

ATTACH HEAD TO THIS SIDE OF PAD.

NOT FOR INDIVIDUAL SALE.

Questions or comments? Please visit us at
www.bathwand.com or call us toll-free at 1-866-255-4105.
 Mfd. for & © 2004 The Clorox Company, 1221 Broadway,
 Oakland, CA 94612. Clorox is a registered trademark of The
 Clorox Company. Patents pending. Made in the U.S.A. -or-
 Made in China -or- Made in Mexico -or- assembled in China



R0646-3.1

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DIRECTIONS FOR USE:

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

TO CLEAN:

1. **PRESS:** Press head onto the FLUFFY SIDE of a disposable cleaning pad.
2. **WET:** Briefly wet the pad to activate the powerful Clorox® cleaner.
3. **CLEAN:** Rewet pad as needed to release more cleaner.
4. **TOSS:** When finished, rinse surfaces with water and toss the disposable pad away.

Also use pad by itself for sinks and fixtures

TO SANITIZE: Start with a dry shower wall -and/or- [bath] tub -and/or- surface. Briefly wet the pad once and start cleaning the surface to be sanitized. Do not rewet the pad more than 10 times -or- Rewet [pad] up to 10 times. Allow surface to remain visibly wet for 5 minutes. Rinse surface with water and toss the disposable pad away.

Kills 99.9% of bacteria on a surface area of [up to] 109 square feet [or size of average shower [enclosure]].

Organisms: Staphylococcus aureus, Klebsiella pneumoniae

TO DISINFECT: Pre-clean the shower walls -and/or- surface, following the cleaning instructions above. Rinse the shower walls -or- surface. Place a new pad on the BathWand head. Briefly wet the pad once and clean entire tub/shower -or- surface that is to be disinfected. Do not rewet the pad. Allow surface to remain visibly wet for 10 minutes. Rinse surface with water and toss the disposable pad away.

[Disinfects] [kills bacteria¹, viruses¹ or germs²] on a surface area of [up to] 109 square feet [or size of average shower enclosure]].

Organisms: Escherichia coli¹, Salmonella choleraesuis¹, Staphylococcus aureus¹, Influenza A^{2,3}, Human Coronavirus^{2,3} and Rhinovirus type 37^{2,3}

Do not use on natural stone, brass or varnished wood. If unsure, spot test in a small, inconspicuous area.

CLAIMS FOR FRONT OR BACK OR TOP OR BOTTOM OR SIDES**General Cleaning/Use claims:****General:**

- A Better Way to Clean
- All-in-one system for easy tub & shower cleaning
- Also use pad by itself for sinks and fixtures
- Designed to clean
- Disposable -and/or- scrubby pad(s) loaded with powerful Clorox® cleaner
- Powerful cleaner in each disposable head
- Quick & Easy One-Time Assembly
- [Ready to use] for a faster clean-no spraying or waiting
- Swiveling head conforms to surfaces
- The evolution of clean
- The ultimate tub & shower solution -or- cleaner

Ergo/reach:

- Better cleaning within [easy] reach
- Designed for Optimal Reach
- Designed to clean, because [, clearly,] you [we] weren't
- Ease-of-Use Commendation by:
 - Arthritis Foundation www.arthritis.org
 - American Physical Therapy Association (APTA) www.apta.org
- Extends your reach by 2 feet for those hard-to-clean areas
- No more bending and stretching
- Reach[es] for a powerful clean [, so you don't have to]
- Reaching a new level of clean
- Stand up and clean

Ease:

- Clean with the wave of a wand
- Cleans: Easily cleans tough bathroom -and/or- tub -and/or- shower dirt like soap scum -and/or- grime -and/or- hard water deposits [and leaves surfaces shiny]
- Convenient and easy to use
- Easily cleans the toughest dirt and soap scum -and/or- grime -and/or- hard water deposits
- Easily removes tough bathroom -and/or- tub -and/or- shower soap scum -and/or- grime -and/or- hard water deposits
- Easy -and/or- simple to use
- Makes cleaning easier
- One tool cleans it all
- Top to bottom bathroom cleaning
- Saves time

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CLAIMS FOR FRONT OR BACK OR TOP OR BOTTOM OR SIDES continued

Cleaning/Soap Scum -and/or- Grime -and/or- Hard Water Deposits:

- Cleans [tough] [bathroom -and/or- tub -and/or-shower] stains -and/or- soils and/or soap scum and/or dirt and/or bathtub ring -and/or- hard water deposits -and/or- grime -and/or- mineral deposits [fast] [with the wave of a wand]
- Cleans [the] [your] bathroom fast with the wave of a wand
- *Cuts through [tough] [bathroom -and/or- tub -and/or- shower] stains -and/or- soils -and/or- soap scum -and/or- dirt -and/or- bathtub ring -and/or- hard water deposits -and/or- grime -and/or- mineral deposits [fast] [with the wave of a wand]*
- Cuts through [tough] soap scum -and/or- grime -and/or- hard water deposits
- Cuts through -and/or- cleans tough soap scum -and/or- grime -and/or- hard water deposits [fast]
- Dissolves -and/or- penetrates -and/or- breaks down [the toughest] [bathroom] [tub & shower] soils
- For a cleaner bathroom -and/or- tub -and/or- shower
- Nothing works faster on soap scum -and/or- grime -and/or- hard water deposits
- Nothing's tougher on tough soap scum -and/or- grime -and/or- hard water deposits
- Powers through soap scum -and/or- grime -and/or- hard water deposits
- Removes [tough] [bathroom -and/or- tub -and/or-shower] stains -and/or- soils -and/or- soap scum -and/or- dirt -and/or- bathtub ring -and/or- hard water deposits -and/or- grime -and/or- mineral deposits [fast] [with the wave of a wand]
- Removes tough [soap scum -and/or- grime -and/or- hard water deposits] [dirt] in bathroom -and/or- tub -and/or- shower
- Soap scum -and/or- grime -and/or- hard water deposits melts away
- Tough on [bathroom -and/or- tub -and/or-shower] [tough] stains -and/or- soils -and/or- soap scum -and/or- dirt -and/or- bathtub ring -and/or- hard water deposits -and/or- grime -and/or- mineral deposits [fast] [with the wave of a wand]
- Tough on soap scum -and/or- grime -and/or- hard water deposits -and/or- dirt
- Wipes out stains in the bath
- You can see it clean -and/or- remove [bathroom -and/or- tub -and/or- shower] soap scum -and/or- grime -and/or- hard water deposits before your eyes
- You can see soap scum -and/or- grime -and/or- hard water deposits melt away

Shine:

- Brighten[s] [your] bathroom(s) -and/or- tub(s) -and/or- shower surfaces
- Cleans -and/or- shines [bathroom -and/or- tub -and/or- shower -and/or- surfaces] without [leaving] a [filmy] [sticky] residue
- Leaves no residue -and/or- surfaces shiny
- Makes surfaces sparkle -and/or- sparkling clean
- No streaking or filming

Deodorizing:

- Cleans and deodorizes basins, tubs, and tiles
- Cleans -and/or- deodorizes all washable -and/or- hard, nonporous surfaces
- Deodorizes
- [Deodorizes:] leaves a clean, fresh scent
- Deodorizes [washable] hard, nonporous surfaces
- Deodorizes [with] [and has] a [clean] [fresh] [scent]
- Fresh scent
- Freshens [the] [your] bathroom -and/or- tub -and/or- shower
- Leaves a fresh, clean scent
- Neutralizes odors
- Removes odors

Promotional Language:

- ___% free
- Bonus
- Bonus! Product[s] A -and/or- B -and/or- C inside!
- Bonus! Clorox ToiletWand inside!
- Bonus! Extra Handle Inside!
- Bonus! ___ Extra pads inside!
- Bonus [pack]
- Economy size
- Extra Handle inside
- Free sample
- Get ___ pads free
- Institutional size
- Patent pending
- Trial size
- Value size

Misc.:

- Bleach free
- Cleans without bleach[ing]
- Contains no bleach
- Contains powerful Clorox® Cleaner
- The cleaning power -and/or- effectiveness of Clorox®
- The cleaning power of Clorox®

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CLAIMS FOR FRONT OR BACK OR TOP OR BOTTOM OR SIDES continued

Disinfection Claims:

Specific Organisms:

- A bathroom -and/or- tub -and/or- shower product for cleaning and disinfecting
- An effective cleaner and limited disinfectant
- Antibacterial [formula]
- Antibacterial action -or- cleaner
- Bacteria-fighting formula
- Bactericide -or- Bactericidal
- Bacteria¹ -or- viruses² -or- germs³ can cause illness. This product kills bacteria¹ -or- viruses² -or- germs³
- Bacteria¹ -or- viruses² -or- germs³ fighting formula
- Bathroom -and/or- tub -and/or- shower [disinfectant] [cleaner]
- Cleans and disinfects
- Cleans and disinfects for a pure clean [bathroom -and/or- tub -and/or- shower]
- Cleans bathroom -and/or- tub -and/or- shower grime -and/or- soap scum -and/or- hard water deposits [and] disinfects
- Cleans, disinfects, and sanitizes
- Disinfectancy -or- Disinfectant [cleaner or formula]
- Disinfectant [cleaner]
- Disinfecting -or- Disinfectant [formula]
- Disinfects
- Disinfects and cleans [the] [your] bathroom -and/or- tub -and/or- shower [against any organism listed*]
- Disinfects and cleans [the] [your] bathroom -and/or- tub -and/or- shower [against bacteria¹]
- Disinfects and deodorizes [by killing bacteria and the[ir] odors [they cause]]
- Disinfects [bathroom -and/or- tub -and/or- shower] surfaces
- Disinfectant [cleaner or formula] against Salmonella choleraesuis (Salmonella) -and/or- Escherichia coli (E. coli)
- Disinfects nonporous [hard] [solid] surfaces
- [Does not just cover up -and/or- mask odors -] Eliminates -or- removes odors [caused by bacteria]
- [Effect]ve Bathroom -and/or- tub -and/or- shower disinfectant -and/or- sanitizer [and cleaner]
- Eliminates odors caused by bacteria
- Kills bacteria¹ -or- viruses² -or- germs³
- Kills bacteria¹ -or- viruses² -or- germs³ ordinary bath cleaners can't
- Kills [bathroom -and/or- tub -and/or- shower] bacteria on [washable] hard, nonporous surfaces
- Kills [bathroom -and/or- tub -and/or- shower] bacteria
- Kills [common -and/or- bathroom -and/or- tub -and/or- shower] bacteria: Salmonella choleraesuis (Salmonella) -and/or- Escherichia coli (E. coli) [in 10 minutes].
- Salmonella choleraesuis and Escherichia coli (E. coli) are common [household] bacteria found in the bathroom -and/or- tub -and/or- shower. This product kills these bacteria in the bathroom -and/or- tub -and/or- shower.
- [The] Cleaning and disinfecting power [of Clorox®], so your bathroom -and/or- tub -and/or- shower is free of grime -and/or- soap scum -and/or- hard water deposits you can see and bacteria¹ -or- viruses² -or- germs³ you can't
- [This product] Attacks -and/or- Kills -and/or- Eliminates -and/or- Destroys -and/or- Removes -and/or- Wipes Out [bathroom -and/or- tub -and/or- shower] [bacteria*] such as Salmonella choleraesuis (Salmonella) -and/or- Escherichia coli (E. coli).
- [This product] Attacks -and/or- Kills -and/or- Eliminates -and/or- Destroys -and/or- Removes -and/or- Wipes Out bacteria [Escherichia coli (E. coli) -and/or- Salmonella choleraesuis (Salmonella)]
- [This product] has the cleaning power -and/or- effectiveness of Clorox® to clean and disinfect
- [This product] has the power of Clorox® to clean tough bathroom -and/or- tub -and/or- shower grime -and/or- soap scum -and/or- hard water deposits and kill bathroom -and/or- tub -and/or- shower bacteria¹ -or- viruses² -or- germs³
- Wipes Out -and/or- Kills [household] [odor-causing] bacteria¹ -or- viruses² -or- germs³
- Wipes Out [household] [odor-causing] bacteria

*Organisms: Escherichia coli¹, Salmonella choleraesuis¹, Staphylococcus aureus¹, Influenza A¹, Human Coronavirus¹ and Rhinovirus type 37¹

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CLAIMS FOR FRONT OR BACK OR TOP OR BOTTOM OR SIDES continued

Sanitization Claims:

- Bathroom -and/or- tub -and/or- shower [cleaner] [sanitizer]
 - Cleans and sanitizes
 - Kills 99.9% of bacteria†
 - Kills 99.9% of [household] [odor-causing] bacteria [and leaves a fresh scent]
 - Kills 99.9% of bacteria [that] ordinary bath cleaners can't
 - Kills 99.9% of bacteria while it cleans
 - Kills 99.9% of Staphylococcus aureus (Staph) -and/or- Klebsiella pneumoniae (Kleb)
 - Leaves bathroom(s) -and/or- tub(s) -and/or- shower(s) [surfaces] [clean and] sanitary
 - Leaves surfaces sanitary
 - Leaves surfaces sanitized
 - Sanitizes Staphylococcus aureus (Staph) -and/or- Klebsiella pneumoniae (Kleb)
 - Sanitizes surfaces
 - This product is a sanitizer
- † Staphylococcus aureus (Staph) and Klebsiella pneumoniae (Kleb)

Surfaces

Use [this product] on the following [washable] hard, nonporous surfaces††:

Surfaces

- | | | |
|--|--|---|
| <ul style="list-style-type: none"> • Baby furniture (cribs, changing tables) • Bathroom -or- restroom surfaces • Bathtubs • Cabinets • Chairs • Chrome • Corian • Countertops -or- Counters • Diaper pails • Doorknobs • Enamel • Fiberglass bathtubs • Fiberglass shower and tub enclosures • Glass • [Glass] Shower[s] [doors] [walls] • Glazed [bathroom -or- restroom] tiles • Glazed ceramic [tile(s)] | <ul style="list-style-type: none"> • Glazed porcelain [tiling] • Hard Plastic • Hard vinyl • Highchairs (non-food contact areas) • 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 • Sealed fiberglass surfaces • Sinks [and fixtures] • Stainless steel or metal surfaces in bathrooms -or- restrooms and kitchens | <ul style="list-style-type: none"> • Stove tops • Synthetic marble • Tables • Telephones • Tile • Toilet[s] exteriors • Tubs • Urinal[s] exteriors • Washable kitchen surfaces • [Washable] Walls • Window[s] [sills] <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> |
|--|--|---|

Surface Compatibility:

- Do not use on natural stone, brass or varnished wood, for all other surfaces, spot test in an inconspicuous area.-or- spot test all other surfaces in an inconspicuous area
- Non-abrasive
- Not harmful for most surfaces
- Won't scratch bathroom -and/or- tub -and/or- shower