

5813-87

4/16/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 16, 2008

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

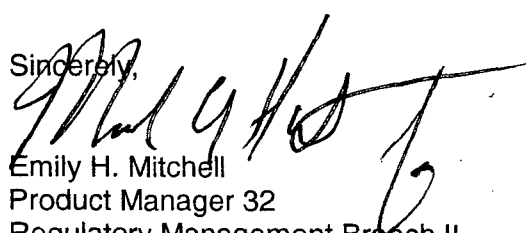
Subject: X-men
EPA Registration Number 5813-87
Application Date: February 26, 2008

Dear Evelyn:

The Agency has reviewed the revised alternate formulations (CSFs) you have submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). In summary, the revised alternate CSFs A01 and A02 are acceptable. In addition, you have made some minor changes to the contact for more information portion of the label and these changes are acceptable as well. A copy of your accepted label is enclosed.

Enclosed is a copy of our chemistry review, D335091. Should you have any questions or comments concerning this letter, please contact Tom Luminello at (703) 308-8075.

Sincerely,



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

Enclosures (2)

2 7 6

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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FRONT PANEL

X-men

**KEEP OUT OF REACH OF CHILDREN
WARNING:**

See Back Panel For Additional Precautionary Statements.

ACTIVE INGREDIENTS:

Glycolic Acid	3.070%
Dioctyl dimethyl ammonium chloride	0.054%
Didecyl dimethyl ammonium chloride	0.081%
Octyl decyl dimethyl ammonium chloride	0.135%
n-Alkyl (50% C14, 40% C12, 10% C16) dimethyl benzyl ammonium chlorides	0.180%
OTHER INGREDIENTS:	96.480%
TOTAL:	100.000%

Net Contents: _____

Contains no phosphorus.

R0650-4

ACCEPTED
 APR 16 2008
 Under the End Use Agreement, Epiquill, LLC
 has agreed to provide this product to you for use
 in accordance with the terms of the license.
 EPA Reg. No. 5813-87

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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.

To Open: Simply twist cap counterclockwise one-quarter turn. Cap does not come off.

-OR-

To Open Child Resistant Cap -or- Closure:

Squeeze sides [of cap -or- closure] where symbols -or- arrows indicate and twist counterclockwise one quarter turn.
[Cap -or- closure] does not come off. To reseal -or- To close [tightly], turn [cap -or- closure] clockwise [until tightly closed].

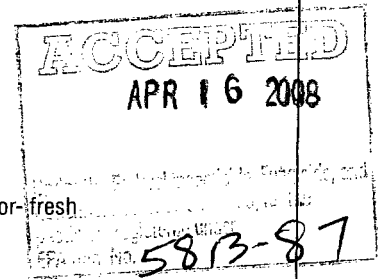
CLEANING

To Clean and Protect Against Stain Build-Up:

- [1.] Flush toilet.
- [2.] Lower bottle so cap is below the rim. Apply product under and around rim to coat the inside of the bowl.
- [3.] Scrub the entire bowl with a stiff brush and allow to sit for 5 minutes.
[Do not allow pets or children to access the toilet during this time.]
- [4.] Flush toilet.
- [5.] For best results reapply weekly to maintain protective barrier against stains.

Cleaning, Deodorizing, Stain Removal, Prevention Claims: Front or Back Panel

- Acts like a guard against [rust, hard water, toilet ring] stains
- Apply weekly to keep your toilet sparkling clean
- Bleach free
- Cleans
- Cleans -and/or- deodorizes
- Cleans -and/or- deodorizes with every flush
- Cleans -and/or- freshens
- Cleans -and/or- Prevents unsightly toilet ring
- Cleans without bleaching
- Clings to coat bowl
- Clings to side[s] of bowl
- Clings to the bowl
- Coats the bowl better
- Contains no abrasives -or- Non-abrasive formula
- Contains no bleach
- Deodorizes
- Easy to use
- Fights tough stains
- For a cleaner, fresher household -or- toilet
- For cleaner, fresher [toilet] [bathroom]
- For use on both white and colored toilets
- Formula cleans and shines
- Formula helps prevent hard water and rust stains
- Fresh Scent
- Freshens
- Freshens your bathroom
- Freshens your toilet
- Go longer between cleanings
- Great for toilets
- Guards against stain build-up [for up to a month] in your toilet
- Helps keep your toilet bowl clean -and/or- fresh [in between scrubbing]
- Helps keep your toilet [bowl] fresh -and/or- clean
- Helps keep your toilet bowl stain-free
- Helps prevent mineral -and/or- hard water stains
- Helps prevent [toilet ring] build up
- Helps [repel] prevent stains -and/or- stain build-up
- It's from Clorox, so it's more than clean
- Keeps toilet cleaner longer
- Keeps your toilet [bowl] clean -and/or- fresh
- Lays down a protective stain barrier
- Leaves a fresh, clean scent
- Leaves bathroom fresh and clean
- Leaves bowl sparkling clean
- Leaves no visible residue
- Leaves the water clear
- Leaves your toilet shiny clean [in between regular cleanings]
- Like a brush in a bottle
- Like a liquid brush
- [Like] a liquid coat of armor for your toilet
- [Like] a liquid shield for your toilet
- Makes your [cleaning] job easier
- Marine Breeze
- Meadow Fresh
- [Mild,] [clean,] [pleasant,] [pleasing,] [citrus,] -and/or- [fresh] scent -or- smell
- Mountain Lavender
- No messy residue to remove
- Non-chlorine formula
- One-step cleaner provides protective coating against toilet stains
- Powerful cleaner with a protective stain fighting -or- resistant layer
- Powerful clinging action
- Powerful coating action
- Prevents stain build-up so cleaning your toilet is less work
- Prevents stain build-up so you don't have to clean as often
- Prevents stains so you can skip a week [of cleaning]
- Prevents stubborn stains and dirt from sticking to [the inside of] your bowl
- Prevents [toilet ring] build up
- Product helps prevent toilet ring build-up
- Protective [barrier] [shield] [layer] [armor] will not flush away
- Protects against [rust,] [hard water,] -and/or- [toilet ring] stains
- Protects against stain build-up
- Protects your toilet like a coat of armor against stains
- Rain Clean
- Removes odors
- Removes -or- Prevents -or- Eliminates odors



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**Cleaning, Deodorizing, Stain Removal, Prevention Claims continued:
 Front or Back Panel**

- Repels -or- prevents stains -or- stain build-up
- Repels stains
- Repels stains [with every flush]
- Repels tough hard water -and/or- mineral -and/or- lime scale stains
- Revolutionary formula coats inside of the bowl with protective barrier to prevent stain buildup (hard water and rust) and unsightly toilet ring
- Safe for -or- will not harm colored toilets
- Safe for -or- will not harm -or- does not harm septic systems
- Spring Mist
- Sunshine Breeze
- Thick toilet bowl cleaner [that clings -or- with clinging action]
- Toilet bowl cleaner that clings

- Use X-men weekly to maintain protection from stain build-up
- Use your brush less often
- Will not harm surfaces
- Will not scratch surfaces
- Will not stain the bowl
- [With] Clinging action
- Won't splash or drip and will rinse away easily
- Works like a coat of liquid armor in preventing tough stains from building up



Packaging Claims:

- New [easy grip] bottle
- New sure grip bottle
- Patent pending
- Patented bottle design
- Same great value

- Same size
- Same volume
- Same volume, new bottle
- Still 23 oz

TEFLON® - Related Claims:

Lays down a protective stain barrier


- Lays down a protective stain barrier with Teflon® surface protector
- Teflon® surface protector lays down a protective -or- effective stain barrier

Teflon® brand protective [coating] [barrier] [formula] [layer] [shield]

- Revolutionary 2-in-1 formula cleans and protects against stain build-up with an invisible Teflon® Surface Protector
- Revolutionary formula made with Teflon® surface protector coats the surface of the toilet bowl creating a stain resistant shield
- Revolutionary formula made with Teflon® surface protector lays down a barrier coating to prevent staining in the bowl
- Revolutionary formula made with Teflon® surface protector to keep your toilet bowl cleaner longer by preventing unsightly toilet ring and stain build-up
- Teflon® surface protector prevents stains with a protective [coating] [barrier] [formula] [layer] [shield] [coat] of armor

X-men is made with a revolutionary stain-repellent [shield] [system] [barrier]

- A barrier against build-up
- A barrier against stains
- A protective coating against stains
- A shield against stains
- Brush less often

- Clean less often
- Cleaning power of Clorox and the [technology] [innovation] from Dupont in one
- Clings to the bowl
- Dependable trust from Clorox
- Keeps Cleaner Longer
- Prevents stubborn stains
- Repels tough soils and stains such as toilet ring, rust and hard water, so your toilet stays cleaner longer
- TEFLON® is a registered trademark of E.I. du Pont de Nemours and Company, used under license by The Clorox Company
- Teflon® surface protector 
- Teflon® surface protector coating keeps your bowl cleaner, longer by preventing build-up and tough stains
- Teflon® surface protector leaves behind a shiny, sparkling, glossy bowl
- Teflon® surface protector prevents rust, hard water, unsightly toilet ring from building up
- Thick formula that sticks to the bowl
- With [the power of] Teflon® [surface protector]
- [Wow!] Keeps stains from sticking
- X-men provides a new level of stain repellency with Teflon® surface protector
- X-men with Teflon® surface protector, a revolutionary stain repellent shield

ACCEPTED
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Sanitization

To [clean and] sanitize [and protect against stain build-up]:

- [1.] Flush toilet.
- [2.] Lower bottle so cap is below the rim. Apply 6 oz of product under and around rim to coat the inside of the bowl.
- [3.] Scrub the entire bowl with a stiff brush and allow to sit for 5 minutes. [Do not allow pets or children to access the toilet during this time.]
- [4.] Flush toilet.
- [5.] For best results, reapply weekly to maintain protective barrier against stains.

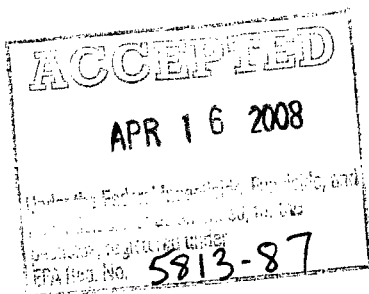
**Sanitization Claims:
Front or Back Panel:**

- A 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]
 - Cleans and kills 99.9% of bacteria
 - Cleans and sanitizes
 - Cleans, kills 99.9% of bacteria -or- sanitizes and freshens
 - Cleans, sanitizes -or- kills 99.9% of bacteria and deodorizes
 - In-bowl sanitizer
 - Kills 99.9% of bacteria
 - Kills 99.9% of bacteria[*]
 - Kills 99.9% of bacteria as it cleans
 - Kills 99.9% of [common] [household] bacteria
 - Kills 99.9% of [common] [household] [odor-causing] bacteria: *Klebsiella pneumoniae* [Kleb] -and/or- *Staphylococcus aureus* [Staph] [in 5 minutes]
 - Kills 99.9% of [household] bacteria
 - Kills 99.9% of [household] bacteria [in toilet -and/or- on hard nonporous toilet bowl surfaces]
 - Kills 99.9% of [household] bacteria on hard nonporous toilet bowl surfaces
 - Kills 99.9% of odor-causing bacteria
 - Kills 99.9% of *Staphylococcus aureus* and *Klebsiella pneumoniae*
 - Kills 99.9% of the following organisms in 5 minutes: *Klebsiella pneumoniae* and *Staphylococcus aureus*
 - Kills odor causing bacteria in the toilet
 - Leaves toilet [bowl] sanitary
 - Leaves [toilet] bowl [water] 99.9% bacteria free with each use
 - Leaves [toilet] surfaces sanitized
 - [Removes stains and] leaves bowl sanitary -and/or- sanitized
 - Removes stains and leaves toilet bowl sanitized
 - Removes tough stains and kills 99.9% of bacteria
 - Sanitizer
 - Sanitizer [for toilet use]
 - Sanitizes
 - Sanitizes in 5 minutes
 - Sanitizes -or- Kills odor-causing bacteria [: *Klebsiella pneumoniae* -and/or- *Staphylococcus aureus*]
 - Sanitizes [toilet -or- bowl] surfaces [in 5 minutes]
 - Sanitizes toilet surfaces against [common] toilet bacteria
 - Sanitizes toilet surfaces [in 5 minutes]
 - Sanitizes under the rim
 - Sanitizes while it cleans
 - Sanitizing cleaner for toilets
 - Sanitizing [formula]
 - Sanitizing formula cleans -and/or- [deodorizes] [freshens]
 - 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
 - Toilet [bowl] sanitizer
 - [Unique] gel formula cleans and kills 99.9% of bacteria -or- sanitizes
- * *Staphylococcus aureus* (Staph) and *Klebsiella pneumoniae* (Kleb)

Child Resistant Closure Claims

Squeeze and twist to open. Close tightly.

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BACK PANEL

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

WARNING:

Causes substantial but temporary eye injury. Do not get in eyes, on skin or clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

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

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.

Questions? or Comments? Please visit us at www.clorox.com or call ~~1-800-xxx-xxx~~ us at 1-800-227-1860.

PHYSICAL AND CHEMICAL HAZARDS: DO NOT USE OR MIX WITH PRODUCTS THAT CONTAIN BLEACH (SODIUM HYPOCHLORITE). To do so may release hazardous gases. Always flush toilet before and after use of this product.

[STORAGE AND DISPOSAL:]

Store in location inaccessible to children [and pets]. Tightly close top between uses. Do not reuse empty container. Discard in trash or offer for recycling. -or- Offer empty container for recycling. If recycling is not available, discard container in trash.

Not harmful to septic systems.

Mfd. for & © 2002, 2005 The Clorox Company,
Oakland, CA 94612
EPA Reg. No. 5813-87
EPA Est. No. 5813-CA-3, CA-4, CA-5, GA-1, 58455-IN-1, IN-2 and 69289-OH-1
(Actual EPA Est. No. in code above or below.)
Made in the U.S.A.
Questions or Comments?
Visit us at www.cloroxbathroomcleaners.com or call toll-free 1-800-227-1860.



R0650-4

