

6836-225

11/12/2003

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NOV 12 2003

Mr. Robert Sloan
 Lonza Inc.
 17-17 Route 208
 Fair Lawn, NJ 07410

Subject: Smart AB (Refill)
 EPA Registration No. 6836-225
 Amendment Date: August 19, 2003
 EPA Receipt Date: August 22, 2003

Dear Mr. Sloan,

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the conditions listed below.

- Update First Aid Statements per PR Notice 2001-1

Conditions

Revise label as follows:

1. Under "Precautionary Statements," delete the "Keep out of reach of children" statement.
2. Under "First Aid, add the "If swallowed" and "If inhaled" statements since you cited the precautions in the "Precautionary Statements."
3. Revise the 1st and 2nd paragraphs, by revising the phrases, "household surfaces," "other surfaces," and "surfaces" to specify household "*hard, nonporous*" surfaces, other "*hard, nonporous*" surfaces, and "*hard, nonporous*" surfaces.
4. Delete the claim, "Smart AB is designed to be used everyday for germ fighting all around the home."
5. Delete the claim, "Helps prevent the spread of household germs." Alternatively, you may state "Smart AB leaves surfaces sparkling clean and reduces the hazard of cross contamination."
6. Revise the claim, "Smart AB has special antibacterial ingredients that kill germs" by deleting "special."

CONCURRENCES

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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7. Revise the 1st statement for the 3rd paragraph of claims to read "Smart AB kill many types of *bacteria*."
8. Revise the claim "kills odor causing germs" to "kills odor causing *bacteria*."
9. Add the claim, Smart AB is effective against Trichophyton mentagrophytes (Athletes Foot Fungus) when used as a disinfectant on hard non porous surfaces in the bathroom.
10. "Deodorize/Disinfect" directions revisions:
 - a. Delete Mold and Mildew Control from the heading, the claim requires separate directions.
 - b. Qualify tile as hard nonporous surface by stating "glazed" tile.
 - c. Add Fungicidal to the heading.
11. Add the following "Mold and Mildew Control directions:

Smart AB effectively inhibits the growth of mold and mildew and the odors caused by them when applied to hard nonporous surfaces. Spray until surfaces are thoroughly wet. Allow surfaces to dry. Repeat weekly or more often if mildew growth returns.

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.

If 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)

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Caution. May cause eye irritation. Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling. Keep out of reach of children.

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.

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.

STORAGE AND DISPOSAL

Store in areas inaccessible to children. Do not reuse empty container with any product other than Smart AB Refill. If not refilling, dispose in trash.

ACCEPTED
with COMMENTS
in EPA letter Dated:

NOV 17 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the purpose of being
registered under EPA Reg. No. 6836-225

Less Plastic to Discard
Refill for

3 8 4

**SMART AB
(refill)**

Antibacterial / Antimicrobial Multi-Surface Household Disinfectant
Cleaner

Cleans and kills germs to leave a sparkling shine.
To clean and kill germs all around your home. Cuts Grease
Leaves no visible residue. Kills germs and cleans to a sparkling
streak free shine.

Clean Fresh / Lemon Fresh / Spring Fresh / Pine Fresh /
Country Garden Potpourri / Powder Fresh / Country Fresh / Fresh
Citrus / Fresh Lime Scent

Active Ingredients:	
Octyl decyl dimethyl ammonium chloride	0.025%
Dioctyl dimethyl ammonium chloride	0.010%
Didecyl dimethyl ammonium chloride	0.015%
Alkyl (C ₁₄ , 50%; C ₁₂ , 40%; C ₁₆ , 10%) dimethyl benzyl ammonium chloride	0.034%
Other Ingredients	99.916%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

SEE LEFT/BACK/RIGHT/SIDE PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS (FIRST AID)

EPA Reg. No. 6836-225
EPA Est. No. 6836-IL-1; 4822-WI-1
Net Contents: 40 Fl. Oz.
1 Gallon

Manufactured by:
LONZA INC., 17-17 Route 208, Fair Lawn, NJ 07410

Smart AB cleans and disinfects household surfaces. It removes grease and dirt. Smart AB cleans even greasy dirt and kills germs all around your home. Bathrooms, kitchens, kid's rooms and pet areas will be left cleaner for your family when you use Smart AB. Smart AB combines a grease cutting formula with antibacterial ingredients to clean kill germs and still leave a sparkling clean Smart shine. Smart AB is an antibacterial cleaner that leaves a sparkling clean Smart shine on all your surfaces. It gives you the same sparkling shine that regular Smart leaves on glass. Now, you can kill germs when you clean and still get a beautiful shine. You can use this antibacterial cleaner with confidence in the kitchen, bathroom -- even in the nursery. Smart AB is designed to be used for everyday germ fighting all around your home.

Smart AB won't leave an ugly looking residue or strong odor behind. It gives you that sparkling clean Smart shine. Smart AB is designed for use on glass and other surfaces but should not be used on wood surfaces. Smart AB has a light pleasant (citrus) scent. Smart AB leaves no residual odor, no lingering odor. Smart AB leaves surfaces sparkling clean and helps prevent the spread of household germs. Smart AB not only cleans away dirt but also leaves surfaces clean. Smart AB has special antibacterial ingredients that kill germs (leaving surfaces disinfected) with no residual odor or visible residue. Bathrooms, kitchens, kid's rooms and other areas are left clean for you and your family.

Smart AB kills many types of germs including Staphylococcus aureus (Staph), Streptococcus faecalis (Strep), Salmonella choleraesuis (Salmonella), and E. coli. It is also effective against Trichophyton mentagrophytes, the athlete's foot fungus. It will effectively inhibit the growth of mold and mildew and odors caused by them. Kills odor causing germs. Smart AB is Virucidal, killing (it will kill) Influenza A/Brazil, Herpes Simplex Types 1 & 2, Vaccinia and HIV-1 (the AIDS virus). Smart AB will kill HIV-1 (the AIDS) virus in 60 seconds.

Questions? Comments? Call 800-558-5252 weekdays 9-9 Eastern Time or write Helen Johnson.

This product contains no phosphates, phosphorous or phosphorous compounds.

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

Remove top from empty Smart AB spray bottle. Remove cap from Refill. Place empty Smart AB spray bottle over opening of Refill. Return Smart AB spray bottle to its upright position. Continue filling until spray bottle is full. Replace trigger spray. If liquid remains in refill bottle, replace cap. Store for future use. Use product according to label direction on Smart AB bottle.

General Household Cleaning: Spray soiled area, then wipe clean. No rinsing! Not recommended for finished wood surfaces. Test on painted areas before using.

Disinfect / Deodorize (Disinfection / Virucidal / Mold and Mildew Control directions): for hard nonporous surfaces such as counters, sinks, tile, stove tops, glass, mirrors and appliances, spray until thoroughly wet and let stand for 10 minutes, then wipe. For heavily soiled areas, clean as directed in General Household Cleaning first.

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*KILLS HIV-1 ON PRE-CLEANED ENVIRONMENTAL SURFACES/OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS).

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 ON SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS.

PERSONAL PROTECTION: Clean-up should always be done wearing protective latex gloves, gowns, masks and eye protection.

CLEANING PROCEDURE: Blood and other body fluids containing HIV must be thoroughly cleaned from surfaces and objects before application of Smart AB.

CONTACT TIME: Leave surface wet for 60 seconds. Use a 10 minute contact time for disinfection against all other virus, bacteria and fungi claimed.

DISPOSAL OF INFECTIOUS MATERIALS: Blood, body fluids, cleaning materials and clothing should be autoclaved and disposed of according to local regulations for infectious waste disposal.