UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Washington, D.C. 20460

August 9, 2007

Georgia Anastasiou
Agent for Lonza, Inc.
coo Lewis \& Harrison
122 C St., NW Suite 740
Washington, DC 20001
Subject: Dantochlor TBS-5
EPA Registration No. 6836-288
Application Date: July 20, 2007
Receipt Date: July 20, 2007

## Dear Ms. Anastasiou:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 9810, FIFRA section 3 (c) 9 .

## Proposed Notification

- Addition of marketing claims
- Addition of optional language to indicate total weight and for different size packaging
- Addition of diagrams that correspond with the directions for use
- Revision to marketing statement to make non-essential text optional


## General Comments

Based on a review of the material submitted, the following comments apply:
The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda $Y$. Henson
Product Reviewer (32)
Regulatory Management Branch II Antimicrobial Division (7510P)


# LEWIS \& <br> HARRISON 

122 C Street, N.W., Suite 740 Washington, D.C. 20001
telephone 202.393.3903
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Consultants in Government Affairs

July 20, 2007

## HAND DELIVERED

Document Processing Desk [NOTIF] Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency

Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

| ATTENTION: | Emily Mitchell <br> Product Manager (32) |
| :--- | :--- |
| SUBJECT: | Lonza, Inc. <br> Dantochlor TBS-5 (EPA Reg. No. 6836-288) <br> Notification of Minor Label Changes per PR Notice 98-10 |

Dear Ms. Mitchell:
As agent for Lonza, Inc., we are submitting a "Notification" pursuant to PR Notice 98-10 for the product Dantochlor TBS-5 (EPA Reg. No. 6836-288). The purpose of this notification is the following:

1) Add the optional marketing language listed below. Please note this language is a reiteration of previously approved marketing language.

- "Concentrated to clean up to 4 months and sanitize up to 2 months"
- "(Powerful) Blue detergents (clean and deodorize)"
-"(Helps) clean(s) (and deodorize(s)) with (powerful) blue detergents"
-"Bleaches away stains"

2) Add optional language to indicate total weight and for different size packaging: "Total weight: 100 grams containing 35 gram Bleach tablet," "Bonus Pack," "3-Pack," "4-Pack," "Each tablet (2-tablet) (set) (Dual Action System) (Dual System) (System) (is concentrated to) clean up to 4 months (and sanitize for up to 2 months)," "Value Pack," " $X$-Pack," "X-Packs for the price of $X$ packs,"
"(Concentrated) 2-tablet system," "(Concentrated) Dual System," "(Concentrated) Dual-Action System," and
"(Concentrated) 2-tablet set."
3) Add diagrams that correspond with the directions for use.
4) Revise the marketing statement "Clean and Deodorize (With Every Flush)" by having the option to remove "With Every Flush."

Enclosed please find the following documents in support of this submission:
A) Application for Pesticide Notification Form, which includes a signed statement certifying compliance with PR Notice 98-10;
B) One (1) copy of the proposed label with changes highlighted; and,
C) Two (2) copies of the proposed labeling.

Thank you for your assistance with this submission. If you have any questions please feel free to contact me at 202-393-3903 ext. 19.

Sincerely,


Agent for,
Lonza, Inc.
cc: Robert Sloan (LONZA, Inc.)


## DANTOCHLOR TBS-5

(In-Tank) Sanitizer for Homes, Schools and Hospitals
(In-Tank) Automatic Toilet Bowl Cleaner (and Sanitizer)
Sanitizes Toilet Bowl Water (After Each Flush)
Kills $99.9 \%$ Of Bacteria In Toilet Bowl Water (After Each Flush)
Cleans and Deodorizes (With Every Flush)
(Helps) Keep Your Toilet Bowl Fresh and Clean
Recommended for frequently flushed toilets
(Each tablet) Kills (Eliminates) (99\% of) bacteria for 2 months
Kills (Eliminates) (99\% of) E. coli
Kills (Eliminates) ( $99 \%$ of) Staphylococcus aureus (staph)
Kills (Eliminates) (99\% of) Salmonella choleraesuis (salmonella)
Kills (Eliminates) (99\% of) Enterococcus faecalis (strep)
Kills (Eliminates) (99\% of) Pseudomonas aeruginosa (pseudomonas)
Kills (Eliminates) ( $99 \%$ of) Candida albicans (candida)
Kills (Eliminates) ( $99 \%$ of) common household bacteria
Kills (Eliminates) (99\% of) bathroom bacteria
Kills (Eliminates) (99\% of) many odor-causing bacteria
Active Ingredients:
1,3-dichloro-5,5-dimethylhydantoin 81.1\%

1,3-dichloro-5-ethyl-5-methylhydantoin ............ 16.1\%
Inert Ingredients: ...............................................2.8\%
Total: ........................................................... 100.0\%
Minimum Available Chlorine
68.0\%

## KEEP OUT OF REACH OF CHILDREN DANGER

See side / back / right / left panel for Precautionary Statements and First Aid

EPA Reg. No. 6836-288
EPA Est. No. 6836-PA-01
Net Weight: 35 grams ( 1.25 oz ) (each)
(Total weight: 100 grams containing $\mathbf{3 5}$ gram Bleach tablet)
Manufactured by: Lonza Inc.
90 Boroline Road
Allendale, NJ 07401

## PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Highly corrosive. May be fatal if swallowed. DO NOT TAKE INTERNALLY. Causes eye and skin damage. Irritating to nose and throat. Avoid breathing dust. Do not get into eyes, on skin or clothing. Wear rubber gloves when handling and wash thoroughly 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.
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.
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, thengive artificial respiration, preferably by mouth-to-mouth, if possible. 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.

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

## PHYSICAL AND CHEMICAL HAZARDS

CHEMICAL HAZARD: STRONG OXIDIZING AGENT. Keep away from heat or flame. Mix only with water.

When used as directed, Dantochlor TBS-5 will sanitize toilet bowl water, keeping it clean, clear and free of odor. Dantochlor TBS-5 gives the effectiveness of chlorine without the chlorine odor.

Dantochlor TBS-5 sanitizes toilet bowl water by (killing) (eliminating) ( $99 \%$ of) bacteria within 15 minutes after each flush. (Kills) (Eliminates) ( $99 \%$ of) bacteria within 15 minutes after each flush. Each (chlorine) tablet sanitizes the foilet bowl water (within 15 minutes) for up to 2 months

## SINGLE OR• TWIN-PACK BLEACH TABLET ONLY

## DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
To Sanitize, Clean, and Deodorize:

1. Clean toilet bowl thoroughly (including) under the rim.
2. Remove toilet tank top. Hold (one) (white) plastic pouch away from face. Cut (one) (end) (side) pouch open with scissors (below the crimped edge) (See diagram A). (DO NOT TOUCH TABLET).
3. Flush toilet. Before tank refills, (hold (plastic) pouch over tank and) place one Dantochlor TBS-5 tablet (from open pouch) into the right rear corner of the tank. (See diagram B). Discard (packaging) and wash hands thoroughly.
4. No removal necessary. Product should only be used in a toilet that is flushed regularly (at least once a week).

## WITH BLUE TABLETS (SINGLE OR MULTI-PACKS) ONLY

## DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
To Sanitize, Clean, and Deodorize:

1. Clean toilet bowl thoroughly (including) under the rim.
2. Remove toilet tank top.
3. Hold (one) (white) (plastic) pouch away from face. Cut (one) (crimped) edge (end) (side) (of pouch) open with scissors. Hold (one) (clear) (plastic) pouch away from face. Cut (one) crimped edge (end) (side) (of pouch) open with scissors. (See diagram A). (DO NOT TOUCH CHLORINE (BLEACH) OR BLUE (DETERGENT) TABLET).
4. Flush toilet. Before tank refills, place one blue and one bleach tablet (place the white chlorine (bleach) and blue (detergent) tablets) (from open pouches) into the right rear corner of the tank. (See diagram B). Discard packaging and wash hands thoroughly.
5. No removal necessary. Simply replace Dantochlor TBS-5 Blue plus Bleach tablets when tablets have completely dissolved in the tank. Product should only be used in a toilet that is flushed regularly (at least once a week).

## STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children in a cool, dry, well-ventilated area. Do not store at elevated temperatures. Discard empty container in trash.
Questions? Comments? Call (insert telephone number here)
(For health and safety information concerning this product call (insert telephone number here))

This product contains no phosphates or phosphorous compounds. No mess. Does not harm plumbing or septic tanks (when used as directed). Concentrated. Leaves bowl 99.9\% bacteria free.

## (OPTIONAL MARKETING LANGUAGE):

- Antibacterial
- Anti-Bacterial
- Antibacterial Toilet Bowl Cleaner
- Anti-Bacterial Toilet Bowl Cleaner
- Anti-Bacterial Bleach (formula)
- Bleach automatic toilet bowl cleaner
- CHLORINE CLEAR with Bleach
- With bleach
- Bleaches (stains away)
- Real Bleach (formula)
- 100\% bleach (formula) (tablet)
- (With) the (concentrated) Power of (chlorine) Bleach
- Bleach Cleaning (power)
- Bleach in every flush
- (A) Bleach rinse in every flush (!)
- Sanitizing Formula Cleans \& Deodorizes (bowl)(water)
- Cleans \& Deodorizes (bowl)(water) With (the power of) (chlorine) Bleach
- Deodorizes (with Bleach)
- Deodorizing
- Deodorizes
- Continuous deodorization
- Keeps Water Crystal Clear
- Easy To Use - Just Drop In Tank
- Easy to Use - No Mess
- Easy to Use
- Kills 99.9\% of bacteria for 2 months (I) In Toilet Bowl Water After Each Flush
- Kills 99\% of bacteria
- Kills (99.9\% of) bacteria flush after flush
- Kills bacteria
- Kills 99.9\% of bacteria (for 2 months)
- Not Harmful to Plumbing or Septic Systems (when used as directed)
- Leaves bowl sanitary
- Makes cleaning easy
- Toilet Bowl Cleaner
- Automatic Toilet Bowl Cleaner
- Controls odor-causing bacteria in the bowl water
- Controls the growth of bacteria that cause odors
- Controls odors caused by odor-causing bacteria
- Controls odor-causing bacteria
- Controls the growth of bacteria
- Controls bacterial growth
- Controls the growth of bacteria that cause odors
- Controls odors caused by odor-causing bacteria
- Kills odor causing bacteria
- Kills bacteria and (helps) prevents stains
- Kills and prevents the growth of bacteria
- Fights tough stains
- Keeps your toilet bowl stain-free
- Continuous (real bleach) cleaning and deodorizing
- Continuous cleaning action (for up to 4 months)
- Continuous sanitizing action
- Continuous cleaning and sanitizing action
- No Mess in tank
- No-Mess formula
- No Mess formula
- Makes cleaning easier
- Instant, continuous bowl cleaning (with every flush)
- Bleach cleaning
- Bleach
- Bleaches
- Bleaches bowl (with)
- Bleach toilet (bowl) cleaner
- (With) the (concentrated) power of bleach(!)
- For colored toilets
- For use with many other blue drop-in(s) (tablets)
- Actual size (tablet) (system)
- Bonus Size (tablet) (system)
- Great Value
- (Each) (Tablet) Cleans up to 4 months
- Concentrated to clean up to 4 months
- Concentrated (formula) (tablet) to sanitize (and clean) for up to 2 months
- Cleans (and sanitizes) with every flush (for up to 2 months)
- Sanitizes up to 2 months
- Cleans and sanitizes up to 2 months
- Sanitize
- Sanitzes
- Sanitizing
- Sanitizes with Bleach
- Sanitizing Formula
- Sanitizing Formula Cleans (bowl)
- Sanitizing Formula Cleans and Deodorizes (bowl) (water)
- Sanitizing Formula Kills (99.9\% of) bacteria for 2 months (in toilet bowl water) (after each flush)
- (Each) (Tablet) sanitizes up to 2 months
- Sanitizes with every (each) flush
- Sanitizes for up to 2 months; cleans for up to 4 months
- Cleans and deodorizes with the power of chlorine (bleach)
- Cleans up to 4 times longer than (30 day tablets) (other tablets) (in tank) automatic toilet bowl cleaners
- (Concentrated) Longest lasting automatic toilet bowl cleaner
- (ls) concentrated to clean up to 4 months
- Concentrated (formula) (tablet) to sanitize (Kill 99.9\% of bacteria) (and clean) for up to 2 months
- Cleans
- Cleaner
- Cleans with bleach
- Cleans away stains
- Cleans away odors
- Makes bowl cleaner
- Makes cleaning easy (easier)
- Cleans for up to 4 months
- Cleans for up to 4 months and sanitizes for 2 months
- Cleans (away) tough stains
- Up to 12 flushes a day
- Circulates (concentrated) cleaners and sanitizers directly into (the) (toilet) bowl
- Circulates the long lasting cleaning power of Dantochlor TBS-5 directly into the bowl for (continuous) (up to 2 months) of sanitization and cleaning
- Each system cleans up to 4 months
- Each (set) pair (of tablets) (are) concentrated to clean up to 4 months (and kill 99.9\% of bacteria for (up to) 2 months
- Each (set) pair (of tablets) (are) concentrated to clean up to 4 months and sanitize for (up to) 2 months
- (Helps) keeps) your bathroom Fresh, Clean, and Sanitary
- Repels tough stains
- (Concentrated formula) Repels (prevents) mineral and other stains (from forming)
- Cleans and Freshens(!)
- Freshens
- Freshening
- Continuously freshens (with evey flush)
- Freshens bowl (and bathroom)
- Freshens bowl
- Freshens with every flush
- Refreshes
- Refreshes bowl with every flush
- Drop-in
- (Contains) No phosphates or phosphorous compounds
- Time release formula (formulation)
- Formulated to deliver consistent (powerful) cleaning and sanitization for up to 2 months!
- For 4-month duration simply add a new, Dantochlor TBS-5 bleach tablet when the first tablet has completely dissolved in the tank.
- (Has) powerful blue detergents) plus chlorine to bleach away stains
- Combined power of bleach and (blue) detergents
- Concentrated size
- Concentrated tablet
- Concentrated to clean up to 4 months and sanitize up to 2 months.
- (Powerful) Blue detergents (clean and deodorize)
- (Helps) cleans) (and deodorize(s))with (powerful) blue detergents
- Bleaches away stains
[Note to reviewer. The following phrases are for packages that contain two or more tablets:]
- 2-Pack (set)
- 2 months of sanitization and cleaning (power)!
- Each tablet kills $99 \%$ of bacteria for up to 2 months (for a total of 4 months)
- Twin Pack
- Bonus Pack
- 3-Pack
- 4-Pack
- Each tablet (2-fablet) (set) (Dual Action System) (Dual System) (System) (is concentrated to) clean up to 4 months (and sanitize for up to 2 months).
- Value Pack
- X-Pack
- X-Packs for the price of $X$ packs
- (Concentrated) 2-tablet system
- (Concentrated) Dual System
- (Concentrated) Dual-Action System
- (Concentrated) 2-tablet set

Bleach


## Blue + Bleach



