



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 29, 2024

Deanna Mansueto
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ARXADA, LLC
Electronic Transmittal: deanna.mansueto@arxada.com

Subject: PRIA Label and CSF Amendment – Adding the HIV claims and the USDA BioBase Logo and additional claims to the label, Plus adding Alternate Formulations CSFs #4, thru #8.
Product Name: NUGEN® Citric-Guard Plus 6
EPA Registration Number: 6836-514
Received Date: 06/29/2023
Action Case Number: 00452867

Dear Deanna Mansueto:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6), you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 11/18/2022
- Alternate CSF #1 dated 11/18/2022

- Alternate CSFs #2-3 dated 11/29/2022
- Alternate CSF #4 dated 06/08/2023
- Alternate CSFs #5- 8 dated 07/25/2023

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Lorena Rivas, via email at rivas.lorena@epa.gov.

Sincerely,



Marcel Howard, Product Manager Team 34
Regulatory Management Branch 2
Antimicrobials Division (7510M)
Office of Pesticide Programs

Enclosure Approved label

Note to Reviewer:

[Items in brackets [AAA] are optional and may/may not be included on final label]

{Items in braces {AAA} are for information purposes and will not appear on final label}

NUGEN® Citric-Guard Plus 6

Active Ingredients:

Citric acid..... 3.83%

Other Ingredients: 96.17%

Total..... 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION [PRECAUCIÓN]

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

ACCEPTED

Apr 29, 2024

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under

EPA Reg. No. 6836-514

EPA Reg. No. 6836-514

EPA Est. No. 6836-NJ-1

6836-PA-1

XXXX-YY-X

Net Contents: X [Fl. Oz.] [Fluid Ounce[s]] [mL] [milliliter[s]] [L] [liters] [gal] [Gallon[s]] [Pints] [pt.] [qt.] [Quart[s]]

[DOT Symbols]

[Country of origin (insert country)]

[Manufactured in (insert country)]

[Barcode]

Manufactured by:

Arxada, LLC

412 Mount Kemble Avenue

Suite 200S

Morristown, NJ 07960

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{Note to reviewer: X is a placeholder that represents a number between 0 and 1,000}

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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, drinking, chewing gum, using tobacco, or using the toilet.

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 treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858-7378. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.

{If container size is 5 gallons or larger, the following Environmental Hazards statements will be used:}

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

{Note to reviewer: Pages 3-11 are considered optional marketing language.}

One-Step^{2,11} Disinfectant

[Disinfectant¹¹] [Disinfects¹¹] [Sanitizer⁵] [Sanitizes⁵] [Virucide*] [Virucidal*] [Bactericidal] [Bactericide]
[Deodorizer] [Deodorizes] [Cleaner] [Cleans] [Germicidal⁶] [Antimicrobial] [Concentrate] [Concentrated]
[For use on hard, non-porous surfaces in Homes, Restaurants, Hospitals, Institutional and Industrial Use]

[Formulated for Veterinary Practice / Animal Care / Animal Laboratory Disinfection¹¹]
[For use in federally inspected meat and poultry plants]

This product contains no [phosphates] [or] [phosphorous compounds].
Contains no phosphate[s]
Phosphate-free
Free of phosphate

Scent Names

{Note to reviewer: each scent below may also be represented by a graphic depicting the corresponding scent.}
GREEN / CITRUS / HERBAL / LAVENDER / CEDAR / MARINE / WOOD / INCENSE / FRESH / ALDEHYDIC /
FLORAL / OZONE / MUSK / EVERGREEN / ALDEHYDE[S] / PINE / LIME / LIME FLORAL / LEMON /
ORANGE / ZEST / GRAPEFRUIT / MANDARIN / FRUIT / TROPICAL [ULTRA FRESH] FRAGRANCE / SCENT
/ SCENTED

Marketing Claims *{These new marketing claims are allowable for the first 6 months}*

New dilutable concentrate disinfectant¹¹
New with 2 minute³ contact times
New, 2 minute³ disinfection
New with 5 minute⁴ contact times
New, 5 minute⁴ disinfection

CLEANING CLAIMS:

A disinfecting¹¹ hard, non-porous, non-food contact surface cleaner for use in {insert areas of use from table}

Bathroom² Cleaner

Bathroom² disinfectant¹¹ cleaner

Botanical Cleaning

Botanical surface² cleaner

Change the way you clean with a product that's simple to use and can help clean up life's everyday messes

Clean & Fresh

Cleans [and] disinfects¹¹ [and deodorizes] hard, non-porous surfaces

Cleans [and disinfects¹¹] everyday messes

[Cleans] [and] [disinfects¹¹] in dilution

[Cleans] [and] [disinfects¹¹] [hard, non-porous, non-food contact surfaces [all over the house]] [kitchens and bathrooms²]

Cleans [and] [disinfects] in one step^{2,11}

[Cleans] [and] [Disinfects¹¹] with [botanically-derived ingredients] [plant-based ingredients]

[Cleans] [and] [or] [Destroys] tough messes

Cleans, Deodorizes and Brightens in one step^{2,11}

Cleans, Disinfects¹¹, & Deodorizes [with the use of Citric Acid]

Cleans and Freshens [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves], and [shiny surfaces²][.]

Cleans [and sanitizes⁵] hard, non-porous, non-food contact surfaces

Cleans [even in dilution]

Cleans everyday [tough] [kitchen²] [and] [bathroom²] messes [fast]

Cleans fast

Cleans Grout

Cleans Hard, Non-porous Water Washable Surfaces!

[Cleans] [Removes] [Dissolves] [away] {insert soil(s) from soils table}

[Cleans] [Removes] [Dissolves] [away] [rust] [soap scum] [crusty] [lime scale] [hard water] [stains] [dirt] [grease] [grime]

Cleans [tough] [grease and grime] {insert soil(s) from soils table}

Cleans [tough] grease and grime [and] [institutional] [soils] [fast]

Cleans [tough] soap scum

Clean without [a] [an] [strong] [fumes] [odor]

Combines cleaning with [virtually] streak-free shine

Concentrated [Disinfectant¹¹ Cleaner]

[Cuts] [Cleans] [Controls]

Cuts cleaning time

Cuts [through] [tough] grease and grime

[Destroys] [Cuts] [Powers through] [Removes] [tough] grease [and grime]

[Dilutable] [Easy to Use] [Non-abrasive] [Pourable] [Streak-free] [formula]

Disinfects¹¹ [as it cleans] [and freshens]

Disinfects¹¹ [Deodorizes] [and] [Sanitizes⁵] as it cleans

[Dissolves] grease [fast] [quickly]

Effective – Cleans soap scum

Effective Cleaner

[Effectively] [Conveniently] clean[s] [and][or] disinfect[s]¹¹

Everyday Cleaner

Floor Cleaner

[For] [a] [an] [advanced] [deep] cleaning [formula] [power] [strength]

For multiple cleaning tasks

For quick clean-ups in one step^{2,11}

Good for most indoor² cleaning tasks

[Great] For cleaning {insert area of use or type of surface from list}

[Great] For cleaning [your] [[home²][kitchen²][bathroom²][room²][dorm²][office²][cart²][car²][classroom²][gym²]]

Great for [kitchens²] [bathrooms²] [most indoor and outdoor² cleaning tasks] [your toughest household² messes]

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CLEANING CLAIMS CONT'D:

Household² disinfectant¹¹ cleaner

Intense cleaning action

Keeps day care centers clean

Kitchen² disinfectant¹¹ cleaner

Leaves floors shiny, fresh and clean

Leaves [household] surfaces² [clean] [and] [deodorized]

Leaves no sticky residue

Multi-Purpose^{2,11} Cleaner

Multi-Purpose^{2,11} cleaning formula suitable for: Bathrooms, Kitchens, Knobs & Switches, Toys⁸, Phones & Remotes

Multi-Purpose^{2,11} [everyday][daily][touch-up] cleaning

Multi-surface² [Restroom] [Bathroom] Disinfectant¹¹ Cleaner

One-step^{2,11} [cleaning][cleaner] [Disinfectant]

Plant-based citric acid cleaner [and][or] [degreaser]

Powerful Cleaner & [Unbelievable] Freshness

Powerful cleaning without the harsh odor

Powerful to remove [dried] [stuck on] [dirt] [grime] [grease] [greasy messes]

Powers away tough stains [and stuck on dirt]

Powers through [tough] household² messes

Powers through [tough] [soap scum] [and] [grease]

Powers through tough [stains][spills][grease]

Quick and easy cleaning

[Quickly] degreases and deodorizes

[Reduces the following allergens⁷] {or} [removes X% of the following allergens⁷] [{insert one or more allergens from Allergens table}]:

[Removes][Reduces][Controls][Cleans] [up to] [more] [than] [90%] [95%] [99%] [of] [common] [pet] [household] [inanimate] [messes] [allergens⁷] [soils] [on [from] surfaces] [with {insert product name}]: [{insert one or more allergens from Allergens table}] [{insert one or more soils from Types of Soils table}]

Removes [tough] [everyday] {insert soil(s) from soils table}

Surface² Cleaner

Tough on [dirt] [germs⁶] [grease]

[Uses] [Harnesses] the cleaning action of citric acid

Will not leave grit or soap scum

ODOR ELIMINATION CLAIMS:

[[As it dries, it] [Deodorizes and] [Freshens and]] cleans away the odors trapped on [[hard] surfaces² [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves]], and [shiny surfaces²], leaving [your] surfaces virtually free of odor causing bacteria.

Cleans and deodorizes surfaces² in restrooms and toilet areas, behind and under sinks and counters, garbage cans and garbage storage areas, and other places where bacterial growth can cause malodors.

Cleans away odors and kills the bacteria that cause them

Cleans away the odors trapped on your household surfaces², leaving your surface [virtually free of] [without] odor causing bacteria

Cleans away the odors trapped on [[hard] surfaces² [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves]], and [shiny surfaces²], leaving [your] surfaces virtually free of odor causing bacteria.

[Controls] [Eliminates 99.9% of] odor-causing bacteria

Deodorizes by killing microorganisms that cause offensive odors

Deodorizes coolers, buckets, garbage pails and other areas where [obnoxious] [unpleasant] [stinky] [awful] odors [may] develop

Deodorizes odor-causing bacteria

Does not just cover up and/or mask odors / [removes] [eliminates] [helps eliminate] [helps remove] [odors] [{insert odor(s) from odor table}]

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ODOR ELIMINATION CLAIMS CONT'D:

Effective against [99.9% of] bacteria that cause odors [on [hard] surfaces² [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves], and [shiny surfaces²]

Effective against odor-causing bacteria

Effectively controls [malodors] [odors] [{insert odor(s) from odor table}]

[Eliminates] [Kills] 99.9% of odor-causing bacteria [from surfaces²]

Eliminates odors [and freshens]

[Helps] [Eliminate[s] [Odors][{insert odor(s) from odor table}]] [and] Cleans [hard, non-porous surfaces], [deodorizing] while leaving a [virtually] streak-free shine

[Helps] Eliminate[s] [odors][{insert odor(s) from odor table}] as it cleans [and shines]

[Helps] Eliminate[s] [odors] [{insert odor(s) from odor table}] [at the source] on [[hard surfaces] [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves], and [shiny surfaces²]].

[Helps] Eliminate[s] odors [caused by bacteria]

[Helps] Eliminate[s] [odors][{insert odor(s) from odor table}], cleans and shines on hard, non-porous household surfaces

[Helps] Eliminate[s] [odors][{insert odor(s) from odor table}], cleans, and shines [throughout the house²] [quickly and easily]

[Helps] Eliminate[s] [odors][{insert odor(s) from odor table}], cuts grease [and grime], and shines [surfaces²]

[Helps] Eliminate[s] odors. [Kills] [Removes] [Gets rid of] [99.9% of] the bacteria that cause them.

[Helps] Eliminate[s] odors with {insert scent name from Page 3}

[Helps][to] Eliminate[s] [Fish][,][smoke][and][bacon grease][{insert odor(s) from odor table}] [odors] [malodors]

Is formulated for use in daily maintenance programs with a balance of detergents, citric acid and fragrances that deliver effective cleaning, disinfecting¹¹ and malodor control.

Keeps your home [clean] [fresh] [and] [fragrant]

Kills bacteria that cause odors [on surfaces²]

Kills odor-causing bacteria [even when diluted]

[Kills] [Removes] [Gets rid of] [99.9% of] bacteria that cause odors [on [hard] surfaces² [glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves]], and [shiny surfaces²]

[Kills] [Removes] [Gets rid of] [99.9% of] bacteria while leaving [a [fresh] [clean] [citrus] scent] [and/or] [freshness]

[Kills] [Removes] [Gets rid of] [99.9% of] bacteria without the [fumes] [smell] [odors] [hospital smell] [{insert odor(s) from odor table}]

Leaves a fresh, clean scent

Leaves your surface² virtually free [of] [from] odors and the bacteria that cause them

Powerful clean with the freshness of {insert scent name from Page 3}

Powerful odor control [deodorizer] formula [on hard, non-porous surfaces]

Provides long lasting freshness against tough pet odors such as those from litter boxes and pet accidents

Quickly [eliminates] [removes] odors

Tough on [odors] [{insert odor(s) from odor table}]

[When used as directed,] Deodorizes areas [generally] [hard to keep fresh] [smelling], [such as] [garbage storage areas], [empty garbage bins] [and] [cans], [toilet bowl], [behind] [and] [under] [sinks] [and other areas] [prone to odors] [caused by microorganisms] [where bacterial growth can cause malodors].

With [a] [touch] [of] {insert scent name from Page 3}

ODOR ELIMINATION + ANTIMICROBIAL CLAIMS:

Cleans AND disinfects¹¹, [while [helping to eliminate] [eliminating] [odors][{insert odor(s) from odor table}]]

[Cleans] [disinfects¹¹] [sanitizes⁵] [deodorizes] [and] [removes offensive odors [such as {insert odor(s) from odor table}] from] [insert use sites from area of use table]

Kill[s] 99.9% of germs⁶, while leaving your home² smelling fresh and clean

[Makes cleaning easy] [Cleans and disinfects¹¹] while helping to eliminate [odors][{insert odor(s) from odor table}] [with] {insert scent name from Page 3}

Removes [germs⁶] [and][bacteria] while leaving your home² smelling fresh

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ANTIMICROBIAL CLAIMS:

2 minute³ acting [disinfectant] [antimicrobial]

5 minute⁴ acting [disinfectant] [antimicrobial]

An effective [disinfectant¹¹] [sanitizer⁵] on hard, non-porous, non-food contact surfaces in the {insert use site from area of use table}

Broad Spectrum [Hospital] [Disinfectant¹¹] [Germicide⁶] [Germicidal⁶]

Cleaning and disinfection in [2 minutes³][5 minutes⁴]

Cleans and disinfects in [2 minutes³][5 minutes⁴]

Cleans what you can't see¹¹

Convenient 2 minute³ hospital disinfection

Convenient 5 minute⁴ hospital disinfection

Disinfect¹¹ or kill germs⁶ without bleaching

Disinfects¹¹ in dilution

Disinfects¹¹ [even] [when diluted with water] [in dilution] when used according to directions for use

Disinfects¹¹ even when diluted [in water]

Disinfects in [just] [2 minutes³][5 minutes⁴]

Disinfects {insert from list of pathogens} in [just] [2 minutes³][5 minutes⁴]

Disinfects¹¹ surfaces by killing¹² [99.9% of] SARS-Related Coronavirus 2 [SARS-CoV-2] [USA-WA1/2020] [in one step]

Disinfects¹¹ while you clean

[Effective against] [Disinfects¹¹] [Kills]¹² [99.9% of] SARS-CoV-2 [virus]

[Effective against] [Disinfects¹¹] [Kills]¹² [99.9% of] SARS-CoV-2 virus, which may cause COVID-19

Effective against SARS-Related Coronavirus 2² [SARS-CoV-2] [USA-WA1/2020] [in 1 minute]

[Eliminates] [Effective Against] [Kills] 99.9% of Bacteria [even when diluted] [even in dilution]

[Eliminates] [Effective Against] [Kills] 99.9% of Viruses*

[Eliminates] [Kills] 99.9% of bacteria & viruses* including flu virus*.²

Everywhere disinfectant^{2,11}

For any hard, non-porous surface where germs⁶ are a concern

Germ⁶ Kill

Hard, non-porous, non-food contact surface [antimicrobial][disinfectant¹¹]

Hospital Disinfectant¹¹ Cleaner

Hospital type disinfection¹¹ [even when diluted] [in dilution]

Is a proven "one-step²" disinfectant¹¹ - cleaner - virucide* - [when used according to disinfection directions].

Is a proven "one-step²" disinfectant³ - cleaner - virucide* in 2 minutes [when used according to disinfection directions].

Is a proven "one-step²" disinfectant⁴ - cleaner - virucide* in 5 minutes [when used according to disinfection directions].

Kills 99.9% of bacteria and viruses*

Kills 99.9% of germs⁶ [even] in dilution

Kills 99.9% of [germs⁶] [bacteria and viruses*]

Kills 99.9% of germs⁶ [on hard, non-porous surfaces]

Kills¹² [99.9% of] SARS-CoV-2, which may cause COVID-19

Kills¹⁴ [99.9% of] the cold and flu viruses* *{If a supplemental label is using the "Kills Cold & Flu Virus" claim, Human Coronavirus, Respiratory Syncytial Virus, and Influenza A Virus H1N1 must be included on the label.}*

Kills 99.9% of viruses* and bacteria

Kills 99.9% of viruses* and bacteria [even in dilution] [even when diluted in water]

Kills 99.9% of [the following] germs⁶ [in 2 minutes³][in 5 minutes⁴] [{insert pathogens from list on page 15}]

Kills X Germs⁶

Kills Bacteria

Kills Bacteria and Viruses*

Kills bacteria and viruses* on hard, non-porous surfaces in [2 minutes³][5 minutes⁴]

Kills bacteria [in 2 minutes³][in 5 minutes⁴]

[Kills] [Destroys] [Eliminates] 99.9% of germs⁶

[Kills] [Destroys] [Eliminates] 99.9% of germs⁶ even in dilution

[Kills] [Destroys] [Eliminates] 99.9% of germs⁶ even when diluted [in water]

[Kills] [Destroys] [Eliminates]¹³ [99.9% of] germs⁶ while it cleans

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ANTIMICROBIAL CLAIMS CONT'D:

[Kills] [Effective against] [the] cold [and] [flu] virus[es]*.2 [on hard, nonporous surfaces] *{If a supplemental label is using the "Kills Cold & Flu Virus" claim, Human Coronavirus, Respiratory Syncytial Virus, and Influenza A Virus H1N1 must be included on the label.}*

[Kills] [Effective against] the virus^{1,2} that may cause COVID-19

[Kills] [Eliminates] 99.9% of SARS-Related Coronavirus^{1,2} [SARS-CoV-2] [USA-WA1/2020] [may be the causative agent of COVID-19] [the virus that may cause COVID-19]

[Kills] [Eliminates] [Removes] [Destroys] 99.9% of [Germs⁶] [Bacteria] [and] [Viruses*] [on [pre-cleaned] surfaces²] [in [just] 2 minutes³][in [just] 5 minutes⁴]

[Kills] [Eliminates] [Removes] [Destroys] 99.9% of {Insert pathogen(s) from list on pages 15 & 16} on [pre-cleaned] surfaces² [in [just] 2 minutes³][in [just] 5 minutes⁴]

Kills germs⁶ effectively

Kills germs⁶ [even when diluted [in water]] [in dilution]

Kills germs⁶ such as: {insert pathogens from list on page 15}

Kills germs⁶ without the bleach smell

Kills Norovirus [in [just] 2 minutes]

Kills [the] cold & flu virus[es]*.2 [in] [1 minute] [60 seconds] *{If a supplemental label is using the "Kills Cold & Flu Virus" claim, Human Coronavirus, Respiratory Syncytial Virus, and Influenza A Virus H1N1 must be included on the label.}*

Kills [the] coronavirus^{1,2} that may cause COVID-19

Kills the virus^{1,2} that may cause COVID-19

Kills viruses*

Kills viruses* and bacteria

Kills viruses* in [1 minute] [60 seconds] *{Note to reviewer: if norovirus is claimed on a supplemental label, the following statement is required: 2 minute contact time is required for norovirus}*

Kills Influenza A Virus H1N1 [on pre-cleaned surfaces²] in [1 minute] [60 seconds]

[Proven to] Kill[s] the virus^{1,2} that may cause COVID-19

Provides hospital disinfection in [just] [2 minutes³][5 minutes⁴] [contact time]

Tested [and proven [effective]] to kill [the] [COVID-19 virus^{1,2}] [SARS-CoV-2²] [even] [in dilution] [in] [1 minute] [60 seconds]

Tested [and proven [effective]] against [the] [COVID-19 virus^{1,2}] [SARS-CoV-2²] [even] [in dilution] [in] [1 minute] [60 seconds]

Tested [and proven [effective]] to help reduce the spread of [the] [COVID-19 virus^{1,2}] [SARS-CoV-2²] between treated surfaces [in] [1 minute] [60 seconds]

This product has disinfecting¹¹ action and kills viruses* and bacteria on hard, non-porous, non-food contact surfaces [in your home] [in public places].

[This product] helps reduce cross-contamination of many germs⁶ between treated surfaces² when directions for disinfection are followed

This product is germicidal⁶ when used as directed for disinfection of hard, non-porous, non-food contact surfaces.

SANITIZATION CLAIMS:

An effective non-food contact surface² sanitizer⁵ [for use in {insert area of use from table}]

Great for use as a non-food contact surface² sanitizer⁵ in {insert area of use from table}

Is an effective one-step sanitizer⁵ - cleaner for use on hard, non-porous, non-food contact surfaces

Kills Bacteria [Even When Diluted]

Kills Bacteria [Even in Dilution]

[Kills] [Destroys] [Eliminates] 99.9% of bacteria [in 30 seconds]

[Kills] [Destroys] [Eliminates] 99.9% of bacteria even in dilution

[Kills] [Destroys] [Eliminates] 99.9% of bacteria even when diluted [in water]

[Kills] [Destroys] [Eliminates] 99.9% of the following bacteria: [Klebsiella aerogenes and Staphylococcus aureus] [on hard, non-porous surfaces] in [30 seconds]

Non-food contact surface² sanitizing cleaner

Sanitize⁵ without bleaching

Sanitizes⁵ [kitchen] [household] [bathroom] [restroom] [non-food contact] surfaces² [in 30 seconds]

Sanitizes⁵ non-food contact surfaces² [even] [when diluted] [in dilution]

NUGEN® Citric-Guard Plus 6

EPA Reg. No. 6836-514

EPA Submission June 8, 2023

{Note to reviewer: X is a placeholder that represents a number between 0 and 1,000}

{Note to reviewer: Y is a placeholder that represents a letter A – Z}

[This product] is a sanitizer⁵ for hard, non-porous, non-food contact surface areas in 30 seconds against Staphylococcus aureus and Klebsiella aerogenes

[This product] Kills 99.9% of [Klebsiella aerogenes] [and] [Staphylococcus aureus] on hard, non-porous surfaces in [30 seconds]

USAGE CLAIMS:

Cleans [[glass], [windows], [mirrors], [faucets], [exterior surfaces of appliances⁹], [stainless steel], [stove tops⁹], [glass furniture], [oven fronts⁹], [exterior surfaces of microwaves]], and [shiny surfaces²]

Cleans [kitchens²], [bathrooms²], [glass], [windows], [mirrors], [appliances⁹], [household surfaces²] [and shiny surfaces²]

Degreases [Degreaser]

Dilute with Cold water

Ease to use

For Daily Use

For hard, non-porous household surfaces [all around the house] [indoor and outdoor]

For [Homes,] Institutional and Industrial Use

For Homes, Institutional, Healthcare, and Industrial Use

For use [away from home][in public places]

[For] use [in] [on] [the] [:] {insert use sites / use surfaces from tables below} [as a multi-purpose^{2,11} disinfectant cleaner]

Great for kitchens², bathrooms and other tough jobs

Is a [versatile] disinfectant¹¹ and for hard, non-porous, non-food contact surfaces in Veterinarian, Animal care and Farm Premise applications

Mop and Bucket

[Multi-Action^{2,11}] [Multi-Purpose^{2,11}] [Multi-Surface²] [Formulation]

Concentrate [can be used in dilution or as is]

[Recommended] [For] [non-abrasive] [non-scratch] [cleaning] [cleaner] of [showers] [tubs] [shower doors] [curtains] [fixtures] [and] [toilet bowls].

[Safe] [to] [for] use on [:] {use surfaces from types of surfaces table below} [as a multi-purpose^{2,11} disinfectant cleaner]

To be used in sanitizing⁵ and disinfecting¹¹ of hard, non-porous, non-food contact surfaces and non-critical equipment which may harbor germs⁶

Use as [Mop n'bucket] [and/or] [spray]

Use Daily to Prevent the Buildup of Dirt and Grime

Use this product to clean, sanitize⁵ and disinfect¹¹ hard, non-porous ambulance equipment and surfaces

Use full strength or [diluted] [in dilution] [diluted in water]

Versatile [-] [works on a wide range of hard, non-porous surfaces]

Where to use: {insert areas of use / types of use surfaces from tables below}

VALUE CLAIMS:

Broad-spectrum [Multi-purpose²] [Multi-surface²] [Bactericidal] [Virucidal*] Disinfectant¹¹

Delivers disinfectant¹¹ and cleaning performance in an economical concentrate

Guaranteed to use fewer bottles¹⁰

Helps you finish [disinfecting¹¹]

[High] [Frequently] touch[ed] surface[s] [disinfectant¹¹] [and] [cleaner]

[Is a disinfectant cleaner that] cleans, disinfects and deodorizes in one step^{2,11}

[Is] an economical concentrate that can be diluted for use with [a mop and bucket], [a sponge or by soaking],

[Immersion in bulk liquid], [Squirt spouts/nozzles], [Trigger sprayers], [and/or] [spray floor mops].

Is effective and economical

Is effective yet economical

Makes {insert value} [{Gallons} {Quarts} {Containers} {XX oz. bottles}]

Saves time [with 2 minute³ disinfection][with 5 minute⁴ disinfection]

[Step-saving], [Time-saving,] [Cost-saving] formula

Use only one product to get a streak-free shine plus antimicrobial action

___ % free

___ % bonus

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VALUE CLAIMS CONT'D:

___ oz. at the ___ oz. price

___ oz. more vs. ___ oz.

___ % more vs. ___ oz.

Value size

Value pack

Trial size

Free sample

Economy size

Institutional size

Get ___ oz. free

Only [\$]___ [cents] per use

Get the same level of clean for 1/___ the cost

Undo weeks of dirt within minutes

Bonus Bottle

X% more

Bonus [Pack] [Size]

Bundle Pack

Club [Pack] [Size]

Combo Pack

Convenient Size

Double Pack

Double Size

Large Size, Small Size, Bonus Pack

Limited Time

Multi-Pack

Twin Pack

Triple Pack

Twin Size

Triple Size

Travel [Size] [Pack]

Value [Pack] [Size]

Variety Pack

2 pack

3 pack

4 pack

[2] [3] [4] [Bundle][Bottles] [Kits] [Pack] [Packs]

Spring Cleaning [Special] [Value] [Bonus] [spray bottle pack]

PACKAGING CLAIMS:

Easy pour [bottle] [container]

More value, less packaging¹⁰

Reduce Packaging Waste¹⁰

SURFACE SAFETY CLAIMS:

Compatible formula for hard, non-porous surfaces

Compatible with {insert surfaces from types of surfaces table}

Leaves no [dull] [sticky] residue

Leaves surfaces virtually streak-free

Non-scratching formula

OTHER CLAIMS:

47% Bio-based content

A bleach alternative

Bleach Free

Botanical

Botanical ingredient[s]

Botanically derived ingredient[s]

Botanical active ingredient

Botanically derived [active ingredient][citric acid]

Botanically based [product]

[Contains no] [No] [Does not contain] [[added] dyes] [added colors] [perfumes] [bleach] [phosphates]

[phosphorus] {Note to reviewer: No added dyes, colors, and perfumes claims can only be used for fragrance and/or dye free formulas}

Creates x gallons of disinfecting all-purpose^{2,11} cleaner [diluted]

Dye free [formula] {Note to reviewer: this claim can only be used for a dye free formula}

[Effective] Plant-based cleaning power

[Formulated] For [Hospital] [Household²] Use

Formulated with no [odors] [fumes]

Formulated with Powered by HYGEN™

Fragrance free [formula] {Note to reviewer: This claim can only be used for a fragrance free formula}

Free of dye [and][or] perfumes {Note to reviewer: This claim can only be used for fragrance and dye free formulas}

It contains technology based on Powered by HYGEN™

Made with plant-derived citric acid

Made [with] [from] biobased [ingredients] [materials] [content]

No fragrance added {Note to reviewer: This claim can only be used for a fragrance free formula}

No fumes

Non-streaking [or] [filming] [sticky residue] [formula]

Patented [Technology]

Plant-based [formula]

Plant-derived [citric acid][disinfectant¹¹][cleaner][cleaning ingredient][content]

Powered by HYGEN™

Powered by HYGEN™ inside

Unscented {Note to reviewer: This claim can only be used for a fragrance free formula}

USDA Certified Biobased

[AREAS OF USE:]

Use **NUGEN® Citric-Guard Plus 6** in:

{Note to reviewer: Each entry below also represents a graphic depicting the corresponding area of use. The graphics will only represent individual objects or outsides or insides of buildings as described below. No people, animal or food will be depicted in graphics.}

Bathrooms
Homes [Households]
Kitchens

Clinics
Dental offices
Health Care Facilities
Hospitals
Medical Offices
Medical Related facilities
Nursing homes
Sick Rooms

Day care centers
Nurseries

Bars
Cafeterias
Convenience stores
Food Preparation Areas
Food processing plants
Food storage areas
Institutional kitchens
Restaurants [Front of House]
USDA inspected food processing facilities

Athletic facilities
Barber shops
Business and office buildings
Colleges
Correctional facilities
Dressing rooms
Exercise facilities
Factories
Hotels
Institutional facilities
Institutions
Locker rooms

Motels
Prisons
Public facilities
Public rest rooms,
Schools
Shower and bath areas
Salons [Beauty] [Tanning]
Universities

Camp grounds
Play ground equipment

Animal laboratories
Dairy farms
Farms
Hog farms
Kennels
Mushroom Farms
Poultry farms
Pet animal quarters
Pet shops
Turkey farms
Zoos

Airplanes
Airports
Ambulances
Boats
Buses
Campers
Cars
Emergency [Police] [EMS] [Fire] [Rescue] vehicles
Mobile homes
Ships
Taxis
Trailers
Trains
Transportation terminals

[TYPES OF SURFACES:]

Use **NUGEN® Citric-Guard Plus 6** on washable hard, non-porous surfaces of:

{Note to reviewer: Each entry below also represents a graphic depicting the corresponding type of surface. No people, animal or food will be depicted in graphics. Only exteriors of microwaves and refrigerators will be depicted. Toy graphics will be submitted to Agency for review.}

Appliances, exteriors	Urinals
Bathroom fixtures	Walls
Bathtubs [fiberglass]	Whirlpool bathtubs
Cabinets	
Cages	Non-critical medical device surfaces:
Chairs	Beds [Medical] [Hospital]
Coils and drain pans of air conditioning ⁹ and refrigeration equipment and heat pumps ⁹	Bed frames
Conductive flooring	Bed rails
Counters [Countertops]	Crutches
Countertop laminates	Defibrillators
Desks	Gurneys
Doorknobs	Non-critical [hospital] [medical] equipment surfaces:
Sealed Floors	[Medical] Examining tables
Garbage cans	[Medical] [Hospital] Lamps
Highchairs	Rescue tools
Kennel runs	Resuscitators
Microwave ovens, exteriors of	[Medical] [Hospital] Scales
	Stands
Outdoor [patio] furniture except cushions and wood frames	Stretchers
Refrigerators, exteriors of	Stethoscopes
Refrigerated storage and display equipment ⁹	Walkers
Showers	Wheel chairs
Shower stalls [Fiberglass]	
Sinks [bathroom] [kitchen] [Fiberglass]	Other hard non-porous surfaces made of:
Stoves ⁹ [stovetops ⁹]	Glazed ceramic
	Glazed enameled surfaces
Tables [Non-wooden picnic tables]	Glazed porcelain
	Laminated surfaces
Tanning beds	Metal
Telephones	Plastic [such as polystyrene or polypropylene]
	Sealed stone
Toilet exteriors	Stainless steel
Toilet bowl exteriors	Upholstery, vinyl and plastic
Toilet bowl surfaces	Woodwork, finished
Toys ⁸	
Tubs [Fiberglass]	
Tiles, glazed	
Ultrasonic baths	

[TYPES OF SOILS:]

Dirt
Fingerprints
Grime
Handprints
Heel/Scuff Marks
Mud
Oil
Outdoor Grime

Pen/Ink Marks
Pencil Marks
Smear [Smudge]
Soap Scum
Stains [Soils]
[Tough] Grease [Splatter]
Tough Soils

[TYPES OF ODORS:]

Cooking Odors
Food Odors
Pet Odors
Smoke Odors

[ALLERGENS:]

cockroach debris
cockroach matter
cockroach particles
[cat] [dog] [pet] [dander] [hair]
dust mite debris
dust mite matter
dust mite particles

hair
household surface dust
pollen [particles] [from timothy grass]
residue from [burning materials] [fireplace soot]
[cigarette smoke] [candles]
rodent feces
rodent saliva

NUGEN® Citric-Guard Plus 6 is a sanitizer for hard non-porous non-food contact surfaces tested according to the method for Sanitizers - Non-Food Contact Surfaces, modified in the presence of 5% organic serum in 30 seconds:

Staphylococcus aureus [ATCC 6538]
Klebsiella aerogenes [ATCC 13048]

When following the disinfection spray directions, **NUGEN® Citric-Guard Plus 6** is a [one-step²] [Hospital Use] disinfectant, Bactericidal tested according to the current AOAC Germicidal Spray Test Method modified in the presence of 200 ppm hard water plus 5% organic serum in 2 minutes against:

{or}

When following the disinfection spray directions, **NUGEN® Citric-Guard Plus 6** [kills] [is effective against]:

[Bacteria:]

Pseudomonas aeruginosa [Pseudomonas] [ATCC 15442]
Staphylococcus aureus [Staph] [ATCC 6538]
Salmonella enterica [Salmonella] [ATCC 10708]
Acinetobacter baumannii [ATCC BAA-1709]
Campylobacter jejuni [ATCC 33291]
Escherichia coli O157:H7 [ATCC 35150]
Enterococcus faecalis [ATCC 29212]
Klebsiella aerogenes [ATCC 13048]
Methicillin Resistant Staphylococcus aureus – MRSA [ATCC 33592]
Shigella sonnei [ATCC 25931]
Klebsiella pneumoniae [ATCC 4352]

When following the disinfection directions for cloth, mop, sponge, [sprayer] or by immersion, **NUGEN® Citric-Guard Plus 6** is a [one-step²] [Hospital Use] disinfectant, Bactericidal tested according to the current AOAC Use Dilution Test Method modified in the presence of 200 ppm hard water plus 5% organic serum in 5 minutes against:

{or}

When following the disinfection directions for cloth, mop, sponge, [sprayer] or by immersion, **NUGEN® Citric-Guard Plus 6** [kills] [is effective against]:

[Bacteria:]

Pseudomonas aeruginosa [ATCC 15442]
Staphylococcus aureus [ATCC 6538]
Salmonella enterica [ATCC 10708]

When following the disinfection directions for virucidal*, **NUGEN® Citric-Guard Plus 6** is a Virucide* tested according to the virucidal qualification modified in the presence of 200 ppm hard water plus 5% organic serum in 1 minute against:

{or}

When following the disinfection directions for virucidal*, **NUGEN® Citric-Guard Plus 6** [kills] [is effective against]:

[Viruses:]

{Note to reviewer: the following are enveloped viruses:}

*Herpes Simplex Virus Type 1 [ATCC VR-733, Strain F(1)]
*Herpes Simplex Virus Type 2 [ATCC VR-734, Strain G]
*Human Coronavirus [ATCC VR-740, Strain 229E]
*Influenza A Virus H1N1 [Strain A/4108/2009, CDC #2009712192]
*Respiratory Syncytial Virus [RSV] [ATCC VR-26, Strain Long]
*SARS-Related Coronavirus 2 [SARS-CoV-2] [cause of COVID-19] [Strain USA-WA1/2020]
*HIV-1 [AIDS virus] [Strain IIIB]

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{Note to reviewer: the following are non-enveloped viruses:}

*Norovirus [Feline Calicivirus as a surrogate] [ATCC VR-782, Strain F-9] in 2 minutes

NUGEN® Citric-Guard Plus 6 [kills] [is effective against] [the following animal viruses] in 2 minutes:
Feline Calicivirus [as a surrogate for Norovirus] [ATCC VR-782, Strain F-9]

{Note to Reviewer: These statements for claims against large non-enveloped, and/or enveloped emerging viral pathogens shall not appear on marketed (final print) product labels.}

EMERGING VIRAL PATHOGEN CLAIMS

This product qualifies for emerging viral pathogen claims per the EPA's 'Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels' when used in accordance with the appropriate use directions indicated below.

This product meets the criteria to make claims against certain emerging viral pathogens from the following viral category[ies]:

- Enveloped viruses
- Large, non-enveloped viruses

<i>For an emerging viral pathogen that is a/an...</i>	<i>...follow the directions for use for the following organisms on the label:</i>
Enveloped virus	Norovirus
Large, non-enveloped viruses	Norovirus

NUGEN® Citric-Guard Plus 6 has demonstrated effectiveness against viruses similar to **[name of emerging virus]** on **hard, non-porous surfaces**. Therefore, **NUGEN® Citric-Guard Plus 6** can be used against **[name of emerging virus]** when used in accordance with the directions for use against **Norovirus** on **hard, non-porous surfaces**. Refer to the **[CDC or OIE]** website at **[pathogen-specific website address]** for additional information.

OR

[Name of illness/outbreak] is caused by **[name of emerging virus]**. **NUGEN® Citric-Guard Plus 6** kills similar viruses and therefore can be used against **[name of emerging virus]** when used in accordance with the directions for use against **Norovirus** on **hard, non-porous surfaces**. Refer to the **[CDC or OIE]** website at **[website address]** for additional information."

Dilution:

Disinfection [1:6].....	21.3 fl. oz. per gallon of water
Disinfection [As is]	No dilution
Virucide [1:6].....	21.3 fl. oz. per gallon of water
Sanitizer [1:6]	21.3 fl. oz. per gallon of water
Clean/Deodorize [1:64].....	2 fl. oz. per gallon of water
Clean/Deodorize [1:128].....	1 fl. oz. per gallon of water
Clean/Deodorize [As is].....	No dilution

{If the following Spanish statement is used, it must appear directly above DIRECTIONS FOR USE.}

PRECAUCIÓN: *Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.*

[If you do not understand the label, find someone to explain it to you in detail.]

DIRECTIONS FOR USE

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

Before use in federally inspected meat and poultry food processing plants and dairies, food products and packaging materials must be removed from the room or carefully protected.

Preparation of Use-Solution:

DISINFECTION: Dilute 21.3 fl. oz. with water to achieve 1 gallon of solution [1/6] or [or equivalent dilution]. [For heavy duty cleaning, use solution as is.]

{Note to reviewer: May substitute with other equivalent dilutions, such as: Dilute 2 fl. oz. with water to achieve 12 fl. oz. of [cleaning] solution}

CLEANING / DEODORIZING: Dilute 1 - 2 fl. oz. with water to achieve 1 gallon of solution [1/128 - 1/64] [or equivalent dilution]. [For heavy duty cleaning, use solution as is.]

{Note to reviewer: May substitute with other equivalent dilutions, such as: Dilute ¼ - 1/2 fl. oz. with water to achieve 1 quart of [cleaning] solution}

[DISINFECTION SPRAY APPLICATION:

Using a coarse spray device, spray use-solution 6 - 8 inches from hard, non-porous surfaces, thoroughly wetting surfaces. Treated surfaces must remain visibly wet for 2 minutes. Do not breathe spray. Wipe dry with a cloth, sponge or mop or allow to air dry. For visibly soiled areas, a preliminary cleaning is required.]

[DISINFECTION CLOTH, MOP, SPONGE, [SPRAYER] OR BY IMMERSION:

Apply use-solution to hard, non-porous surfaces, thoroughly wetting surfaces with a cloth, mop, sponge, [sprayer] or by immersion. Treated surfaces must remain visibly wet for 5 minutes. Wipe dry with a cloth, sponge or mop or allow to air dry. For visibly soiled areas, a preliminary cleaning is required.]

[For sprayer applications, use a coarse spray device. Spray 6 - 8 inches from the surface. Do not breathe spray.]

[VIRUCIDAL* DIRECTIONS:

Apply use-solution to hard, non-porous surfaces, thoroughly wetting surfaces with a [cloth,] [mop,] [sponge,] sprayer [or by immersion]. Treated surfaces must remain visibly wet for [1 minute] [60 seconds]. *{Note to reviewer: if claiming contact time for Norovirus, the following sentence will be required.}* **[For Norovirus [Feline Calicivirus as a surrogate],** treated surfaces must remain visibly wet for 2 minutes.] Wipe dry with a cloth, sponge or mop or allow to air dry. For visibly soiled areas, a preliminary cleaning is required.]

Prepare a fresh solution daily or more often if the solution becomes visibly dirty or diluted.

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Rinse all surfaces that come in contact with food such as countertops, appliances, tables and stovetops with potable water before reuse. Do not use on utensils, glassware and dishes.

{Note for reviewer: For labels that list medical premises and metal and / or stainless steel surfaces, one of the following statements must be used:}

This product is not to be used as a terminal sterilant / high level disinfectant on any surface or instrument that [1] is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or [2] contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. [This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.]

{or}

This product is not for use on medical device surfaces.

***KILLS HIV 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 must always be done wearing protective gloves, gowns, masks and eye protection.

Cleaning Procedure: Blood and other body fluids containing HIV-1 must be thoroughly cleaned from surfaces and objects before application of **NUGEN® Citric-Guard Plus 6**.

Contact Time: Leave surface visibly wet for 1 minute.

Disposal of Infectious Material: Blood, body fluids, cleaning materials and clothing must be autoclaved and disposed of according to local regulations for infectious waste disposal.

TOILET BOWL [AND URINAL] DISINFECTANT / CLEANER DIRECTIONS:

Remove visible filth prior to disinfection.

Add 21.3 fl. oz. of solution to the bowl and mix. Brush over exposed surfaces and under the rim; allow to stand for 5 minutes and flush.

FOR USE ON SEALED FINISHED FLOORS:

To limit gloss reduction use use-solution of **NUGEN® Citric-Guard Plus 6**. Apply with a damp mop, spray mop [system] or auto scrubber or spray. Allow surface to remain visibly wet for 5 minutes. Wipe or allow to air dry.

SALON / BARBER INSTRUMENTS AND TOOLS DISINFECTION [BACTERICIDE] / VIRUCIDE* DIRECTIONS:

Use **NUGEN® Citric-Guard Plus 6** use-solution to disinfect hard, non-porous instruments and tools.

Completely immerse combs, brushes, rollers, manicure and other salon instruments and allow them to remain visibly wet for 5 minutes. For visibly soiled instruments and tools, a preliminary cleaning is required. Rinse thoroughly and dry before use.

Note: Plastics may remain immersed until ready to use. Stainless steel shears and instruments must be removed after required contact time, rinsed, dried and kept in a clean, non-contaminated receptacle. Prolonged soaking may cause damage to metal instruments.

ULTRASONIC BATH DISINFECTANT [/VIRUCIDAL*] DIRECTIONS:

Use **NUGEN® Citric-Guard Plus 6** to disinfect hard, non-porous, non-critical objects compatible with Ultrasonic cleaning units. Pour fresh use-solution directly into bath chamber. Preclean visibly soiled objects. Place objects into unit and operate for a minimum of 5 minutes, according to the manufacturer's directions. Remove objects and wash with sterile water [sterile water for injection] or allow to air dry. Prepare fresh solution for each use.

DISINFECTION OF [WHIRLPOOL [UNITS] [BATH[S]]:

After using the [whirlpool [unit] [bath]], drain and refill with fresh water to [just cover the intake valve] [cover the highest jet] [2 inches above the highest jet]. Wash down the sides, [[deck,] [seat of chair lift,] [any related

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equipment,]] and any uncovered surfaces on the [bath] [unit] with a clean swab, brush or sponge until visibly clean. Add 21.3 fl. oz. of **NUGEN® Citric-Guard Plus 6** for each gallon of fresh water added. Start the pump to circulate the solution. Treated surfaces must remain visibly wet for a minimum of 5 minutes. After the [unit] [bath] has been thoroughly disinfected, drain the solution from the [unit] [bath] and rinse the disinfected surfaces with fresh water. Wipe dry with a clean sponge or cloth or allow to air dry. Repeat for visibly soiled units.

DISINFECTION OF FOOT SPAS:

After using the whirlpool foot spa, drain the water. Use 21.3 fl. oz. of product per gallon of water to cover the intake valve or 2 inches above the highest jet. Start the pump to circulate the solution. Swab exposed surfaces including unit sides, chair and any related equipment thoroughly with a cloth, sponge or brush until visibly clean and allow treated surfaces and solution to stand for a minimum of 5 minutes. After the unit has been thoroughly disinfected rinse all disinfected surfaces with fresh water.

VETERINARY PRACTICE / ANIMAL CARE / ANIMAL LABORATORY / ZOOS / PET SHOP / KENNELS DISINFECTION / VIRUCIDAL DIRECTIONS:

For cleaning and disinfecting hard, non-porous surfaces: equipment used for feeding or watering animals, utensils, instruments, cages, kennels, stables, catteries. Remove all animals and feeds from premises, animal transportation vehicles, crates, etc. Remove all litter, droppings and manure from floors, walls and surfaces of facilities occupied or traversed by animals. Empty all feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate surfaces with a use-solution of **NUGEN® Citric-Guard Plus 6** for a period of 5 minutes. Wipe or allow to air dry. Immerse all animal handling and restraining equipment as well as forks, shovels, and scrapers used to remove litter and manure. Rinse all surfaces that come in contact with food, including equipment used for feeding or watering, with potable water before reuse. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed, set or dried.

FARM PREMISE USE:

Remove all animals and feed from premises, vehicles and enclosures. Remove all litter and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate all surfaces with a use-solution of **NUGEN® Citric-Guard Plus 6** for a period of 5 minutes. Immerse forks, shovels and scrapers used for removing litter and manure. Ventilate buildings, cars, boats and other closed spaces. Do not house livestock or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers with soap or detergent, and rinse with potable water before reuse.

POULTRY AND SWINE PREMISE DISINFECTION [VIRUCIDAL] DIRECTIONS:

Remove all animals and feeds from premises, vehicles and enclosures such as coops and crates. Remove all litter, droppings and manure from floors, walls and surfaces of barns, pens, stalls, chutes and other facilities and fixtures occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Surfaces should be visibly clean prior to treatment. Use **NUGEN® Citric-Guard Plus 6** use-solution. Saturate surfaces with the disinfecting solution for 5 minutes. Immerse forks, shovels, and scrapers used for removing litter and manure. Ventilate buildings, coops and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains and waterers with soap or detergent, and rinse with potable water before reuse.

HATCHERIES: Use **NUGEN® Citric-Guard Plus 6** use-solution [or undiluted product] to treat the following hard, non-porous surfaces: hatchers, setters, trays, racks, carts, sexing tables, delivery trucks and other hard surfaces. Surfaces should be visibly clean prior to treatment. Leave all treated surfaces wet visibly for 5 minutes. Then allow to air dry.

VEHICLES: Clean all vehicles including mats, crates, cabs and wheels with water or **NUGEN® Citric-Guard Plus 6** use-solution. Surfaces should be visibly clean prior to treatment. Apply **NUGEN® Citric-Guard Plus 6** use-solution to treat all vehicle surfaces. Leave all treated surfaces visibly wet for contact time indicated on the label; allow to air dry.

DRESSING PLANT DISINFECTANT DIRECTIONS: Disinfect equipment, utensils, walls and floors in poultry and animal dressing plants. Disinfect all rooms, exterior walls and loading platforms of dressing plants. Cover or remove all food and packaging materials. Remove all visible soil prior to application. Surfaces should be visibly clean prior to treatment. Saturate all surfaces with **NUGEN® Citric-Guard Plus 6** use-solution. Scrub to loosen all soils. Surfaces must remain visibly wet for 5 minutes, then thoroughly rinsed with potable water before operations are resumed.

Presoak [To Disinfect] [Soft][Fabric][Surfaces] [Disinfection] [Disinfectant] [Directions]:

Completely immerse fabrics and other types of [soft][fabric] surface equipment used in handling and restraining animals in **NUGEN® Citric-Guard Plus 6** use-solution for 5 minutes to disinfect. Rinse thoroughly with clean water or machine wash after presoak.

MUSHROOM FARM PREMISE USE:

Site Preparation: The first step in any on-going sanitation program must be the removal of visible contamination and debris. This may be accomplished by using a shovel, broom, or vacuum, depending on the area to be disinfected.

Cleaning and Disinfection: For general cleaning and disinfection, use **NUGEN® Citric-Guard Plus 6** use-solution. Surfaces should be visibly clean prior to treatment. Apply use-solution using a sprayer 6-8 inches away from the surface to thoroughly wet the surfaces. Apply use-solution with a cloth, mop, sponge, sprayer or by immersion to thoroughly wet the surfaces. Treated surfaces must be allowed to remain visibly wet for 5 minutes. Wipe or allow to air dry. For visibly soiled areas, preclean first.

For Heavy Duty Cleaning: When greater cleaning is desired, use **NUGEN® Citric-Guard Plus 6** undiluted. Visibly soiled areas may require repeated cleaning before treatment.

DO NOT APPLY USE-SOLUTION TO THE MUSHROOM CROP, COMPOST OR CASING. Rinse treated surfaces with potable water before they contact the crop, compost or casing.

TO SANITIZE NON-FOOD CONTACT SURFACES:

Use **NUGEN® Citric-Guard Plus 6** use-solution to sanitize hard, non-porous surfaces. Treated surfaces must remain visibly wet for 30 seconds. Wipe dry with a sponge, mop, or cloth or allow to air dry. Do not use in food preparation, food handling and food storage areas. This product is not to be used on glassware, dishware, cookware or utensils.

TO SANITIZE BARBER / SALON INSTRUMENTS AND TOOLS: {Not For Use in California}

Spray 6-8 inches away from precleaned barber / salon instruments and tools (such as combs, brushes, razors, scissors, blades and manicure instruments) using a use-solution of **NUGEN® Citric-Guard Plus 6** and allow them to remain visibly wet for at least 30 seconds. Rinse thoroughly and dry before use. Prepare a fresh solution daily or more often if solution becomes visibly diluted, cloudy or soiled.

NOTE: Plastics require no rinsing. Stainless steel shears and instruments should be rinsed and dried after 30 seconds and kept in a clean non-contaminated receptacle. Prolonged contact with the sanitizing solution may cause damage to metal instruments.

SANITIZATION OF [WHIRLPOOL [UNITS] [BATH[S]]:

After using the [whirlpool [unit] [bath]], drain and refill with fresh water to [just cover the intake valve] [cover the highest jet] [2 inches above the highest jet]. Wash down the sides, [[deck,] [seat of chair lift,] [any related equipment,]] and any uncovered surfaces on the [bath] [unit] with a clean swab, brush or sponge until visibly clean. Add 21.3 fl. oz. of **NUGEN® Citric-Guard Plus 6** for each gallon of fresh water added. Start the pump to circulate the solution. Treated surfaces must remain visibly wet for a minimum of 30 seconds. After the [unit] [bath] has been thoroughly sanitized, drain the solution from the [unit] [bath] and rinse the sanitized surfaces with fresh water. Wipe dry with a clean sponge or cloth or allow to air dry. Repeat for visibly soiled units.

{For food processing or other facilities that have installed entryway sanitizing systems}

SHOE BATH SANITIZER DIRECTIONS: To reduce cross contamination between treated surfaces in animal areas, shoe baths containing one inch of freshly made solution must be placed at all entrances to buildings and hatcheries. Scrape waterproof work boots and place in a 21.3 fl. oz. per gallon of water use-solution for 30 seconds prior to entering area. Change the solution in the bath daily or when solution appears diluted or soiled.

SHOE FOAM SANITIZING DIRECTIONS:

To reduce cross contamination between treated surfaces in animal areas and the packaging and storage areas of food plants. Apply a foam layer approximately ½ to 2 inches thick made from a solution of 21.3 fl. oz. of **NUGEN® Citric-Guard Plus 6** per gallon of water [or equivalent dilution], at all entrances to buildings, hatcheries, production and packaging rooms by using a foam generating machine or aerator to apply the foam layer. Follow the foaming directions as specified by the manufacturer of the foam generator or aerator. Scrape waterproof work [boots] [shoes]. Stand or walk through foamed area for 30 seconds prior to entering area. Wash and replace Foam Area at least daily or more often if the Foam Area appears diluted or soiled.

TO CLEAN [/ DEODORIZE] [/ REMOVE ALLERGENS⁷]: Dilute 2 fl. oz. per gallon of cold water.

Apply to surface with [cloth,] [sponge,] [mop] [or] [trigger spray] until visibly wet. Wipe with a clean [cloth] [sponge] [or] [mop]. When using full strength, rinse thoroughly with clean water. [Prepare a fresh bucket of solution every time you clean or more often as needed.]

Cleaning Solution: Dilute 2 fl. oz. per gallon of water for cleaning of kitchen counters, tables, walls, bathrooms, toilet seats, mopping floors and large routine applications.

Deodorizing directions:

Nursing Homes, Hospitals, Hotels, Schools, Restaurants: Using 2 fl. oz. in chemical toilets, waste receptacles, bed pans, drainage bottles, diaper pails, hampers, disposals, commodes and air conditioner pans will eliminate odors.

Mopping Solutions, Automatic Scrubbers: [Using] 2 fl. oz. per gallon of cleaning solution eliminates undesirable odors.

Laundry: 2 fl. oz. per load added during the final rinse cycle deodorizes all offensive odors.

Air Freshener/Automotive Uses: 2 fl. oz. per gallon of water or desired concentration will effectively eliminate damp musty odors caused by mildew in storage areas, basements, closets and bathrooms. Effective on smoking and cooking odors [garlic, fish, onions, etc.]. Automobile odors from tobacco, musty carpet smell and beverage smells will be eliminated.

Carpets: 2 fl. oz. per gallon of shampoo solution eliminates odors associated with urine, vomit, smoke, and mildew. Reapply after cleaning for freshening effects. Allow to dry.

RV Holding Tanks: Toilet waste: cover bottom of holding tank with water and add 2 fl. oz. If odors return before time to empty, simply add 2 fl. oz. to the tank. Kitchen waste: 2 fl. oz. of **NUGEN® Citric-Guard Plus 6** to gray water tank as needed to control malodors created by dirty dish water.

Pet Odors: Use 2 fl. oz. per gallon of water or desired concentration, for urine, feces, and vomit, in carpet and upholstery. Clean prior to application then spray onto affected areas. Test hidden area for colorfastness. Allow 2 minutes contact time. Then blot with clean cloth. Allow to dry. Also effective on pet bedding and litter boxes.

Sewage Backup, Water Damage: Use 2 fl. oz. per gallon of water or desired concentration. Spray over affected areas before and after cleaning and extraction. Allow 2 minutes contact time. Use proper ventilation; open windows.

{Note to reviewer: For Nonrefillable Containers, Label has Household and Residential Uses}

STORAGE AND DISPOSAL

Store in original container and place in a locked storage area. Nonrefillable container. Do not reuse or refill this container. Wrap [container] and put in trash or offer for recycling if available.

{or}

Store in original container and place in a locked storage area. Nonrefillable container. Do not reuse or refill this container. Wrap [container] and put in trash or offer for reconditioning, if appropriate.

{Note to reviewer: For Nonrefillable Containers for commercial, industrial, and institutional uses – all sizes – Chapter 13, Table C3 of the Label Review Manual's statements about burning are labeled as "Not required;" therefore, no incineration language is provided for plastic containers.}

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Open dumping is prohibited. Store in original container in areas inaccessible to children.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling:

{Plastic and Metal Containers:} Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Fill container 1/4 full with water and recap. Shake for 10 seconds. Drain for 10 seconds after the flow begins to drip. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

{Bag in Box Containers:} Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Completely empty bag into application equipment, then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration.

{Note to reviewer: For Nonrefillable Sealed Containers: Several packaging options are designed for use dilution systems with sealed containers or bottles to reduce worker exposure to the concentrate. None of these can be triple rinsed because they are closed sealed containers. The following text will be used on these sealed container types:}

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Open dumping is prohibited. Store in original container in areas inaccessible to children.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available or place [or put] in trash or in a sanitary landfill.

{Note to reviewer: For Refillable Containers – all sizes – In Chapter 13, Table C10 of the Label Review Manual the statement including incineration is labeled as “Not required;” therefore, no incineration language is provided for plastic containers.}

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage:

Open dumping is prohibited. Store in original container in areas inaccessible to children.

Pesticide Disposal:

Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Handling:

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

{Plastic or Metal Containers:} To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat this rinsing procedure two more times. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Footnotes:

¹SARS-Related Coronavirus 2

²On hard, non-porous, non-food surfaces

³When used according to the disinfection spray application directions.

⁴When used according to the cloth, mop, sponge, [sprayer] or by immersion disinfection directions.

⁵When used according to the sanitization directions

⁶ {Insert pathogens from pages 15 & 16}

Note to reviewer: *If a supplemental label is using the “Germs” claim, per the EPA Guidance on use of the term “Germs” in order to make a qualified “germ” claim the supplemental label must be a broad spectrum disinfectant and list additional claims against: Viruses and must bear disinfectant directions. The front panel of the label for a qualified claim must contain a designator [such as **] that refers the user to the qualified statements that describes the type of germ the product is efficacious against.*

⁷This product removes the following allergens: [cockroach debris] [,] [cockroach matter] [,] [cockroach particles] [,] [[cat] [dog] [pet] [dander] [hair]] [,] [dust mite debris] [,] [dust mite matter] [,] [dust mite particles] [,] [hair] [,] [household surface dust] [,] [pollen [particles] [from timothy grass]] [,] [residue from [burning materials] [fireplace soot] [cigarette smoke] [candles]] [,] [rodent feces] [,] rodent saliva

⁸Rinse toys with clean, potable water after disinfecting

⁹Allow the surface to adjust to room temperature before disinfection

¹⁰Compared to Ready-to-Use Products

¹¹When used according to disinfection directions

¹²Kills 99.9% of Sars-CoV-2 on hard, non-porous surfaces in 1 minute

¹³Kills 99.9% of *Pseudomonas aeruginosa* [*Pseudomonas*], *Staphylococcus aureus* [*Staph*], [*Salmonella enterica* [*Salmonella*]] and {insert 1 or more viruses from pages 15 & 16} on hard, non-porous surfaces in [2] [or] [5] minutes

¹⁴Kills 99.9% of Human Coronavirus, Respiratory Syncytial Virus, and Influenza A Virus H1N1 on hard, non-porous surfaces in 1 minute

{Note to reviewer: The following is considered optional graphics and marketing language.}

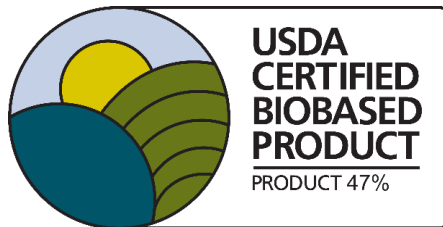
{Note to reviewer. The following may be used only if the supplemental registrant has obtained a Kosher Certification.}



{Any Kosher Symbol such as:}

[Kosher]

{Note to reviewer: The following may be used for products used for farm disinfection.}



NUGEN® Citric-Guard Plus 6

EPA Reg. No. 6836-514

EPA Submission June 8, 2023

{Note to reviewer: X is a placeholder that represents a number between 0 and 1,000}

{Note to reviewer: Y is a placeholder that represents a letter A – Z}