

APR 19 2006

Jason McCauley
Environmental & Regulatory Supervisor
Illinois Tool Works, Inc.
D/B/A ITW Dymon
805 E. Old 56 Hwy. Olathe KS 66061

Subject: **Do-IT ALL Germicidal Foaming Cleaner**
EPA Registration Number 11694-88
Application Dated January 6, 2006
EPA Received Date January 10, 2006

Dear: Mr. McCauley:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are acceptable with comments.

Proposed Labeling

- Adding label claim

Efficacy Review:

1. The proposed label claims are acceptable for the product, DO-IT ALL Foaming Germicidal MRID# 467333-01 as a disinfectant with virucidal claims against Human Coronavirus in the presence of 5% organic soil when sprayed for 2-3 seconds at the distance of 6-8 inches for a contact time of 10 minutes, on hard, non-porous surfaces.
2. The data to support the label claim for Human Coronavirus does not support a label claim for this product as a disinfectant against the causative agent of Severe Acute Respiratory Syndrome (SARS).
3. Remove the word "Heavy" as a descriptive for fungicidal usage.
4. The statement "Preclean all surfaces prior to disinfection" must be placed at the beginning of the Disinfection, Cleaning, and Deodorizing directions.

CONCURRENCES

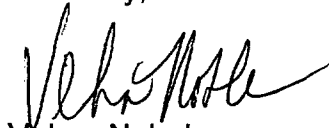
SYMBOL							
SURNAME							
DATE							

General Comments:

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland on (703) 308-6224.

Sincerely,



Velma Nobel
Product Manager (31)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure: Efficacy review dated March 8, 2006 and Label

MASTER LABEL

All word(s), phrases, or symbols in { } and **bolded** are OPTIONAL
* Denotes Additional Brand Name

DIRECTIONS FOR USE

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

Disinfection, Cleaning, and Deodorizing: On hard non-porous surfaces such as bathroom tiles, fixtures, shower stalls, walls, sinks and bathtubs, proceed as indicated below:

1. Hold container six to eight inches from surface to be treated.
2. Spray area until it is covered with the solution. Allow the product to penetrate and remain wet for 10 minutes. No scrubbing necessary.
3. Wipe off with a clean cloth, mop or sponge. The product will not leave grit or soap scum.

Preclean all surfaces prior to disinfection. This product is designed for general cleaning and disinfecting in nursing homes, hospitals, institutions, offices, schools, motels and hotels. This product is formulated to disinfect inanimate hard surfaces (such as walls, sink tops, tables, chairs, telephones, door knobs, light switches, shower stalls, hampers, cabinets and bed springs). When used as directed, this product is effective against *Staphylococcus aureus*, *Salmonella choleraesuis* and *Pseudomonas aeruginosa*, thus meeting requirements for hospital use. Efficacy tests have demonstrated that this product is an effective one-step cleaner-disinfectant in the presence of organic soil (5% blood serum). **Deodorizing:** This product deodorizes those areas which generally are hard to keep fresh smelling such as garbage storage areas, empty garbage bins and cans, basements, restrooms and other areas which are prone to odors caused by microorganisms.

Heavy Fungicidal: Against Pathogenic fungi (*T. mentagrophytes*) when used as directed on hard surfaces found in the bathroom, shower stall and locker room or other clean, hard nonporous surfaces commonly contacted by bare feet.

Mildewstat: To control and prevent mold and mildew on hard nonporous surfaces (such as floors, walls, table tops), spray the surface to be treated, making sure to wet completely. Let air dry. Repeat application at weekly intervals or when mildew growth reappears.

Virucidal: Against Herpes Simplex Type 1 virus, Herpes Simplex Type 2 (genital) virus, Influenza A₂ (Hong Kong) virus, Human Coronavirus (HCoV) and HIV-1 (AIDS Virus).

***KILLS HIV-1 ON PRECLEANED 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 (AIDS VIRUS) OF SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS.

PERSONAL PROTECTION: Disposable gloves should be worn when cleaning blood, body fluids, or contaminated items. Hands should be washed immediately and thoroughly after gloves are removed, or if hands are contaminated with blood or body fluids. Masks and protective eyewear or faceshields should be worn during cleaning procedures involving blood or body fluids. Gowns or aprons should be worn during cleaning procedures for protection against splashes of blood or other body fluids.

CLEANING PROCEDURE: Blood and other body fluids must be thoroughly cleaned from surfaces and objects with a suitable detergent before application of the disinfectant. After cleaning is complete, follow disinfection procedures described previously.

CONTACT TIME: Leave surface wet for 10 minutes.

DISPOSAL OF INFECTIOUS WASTE: Contaminated waste and blood and other body fluids should be autoclaved and disposed according to local regulations for infectious waste disposal.

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.

(Product Name) Germicidal Foaming Cleaner

Cleaner-Disinfectant-Deodorizer-Fungicide
Virucide* -Mildewstat (on hard inanimate surfaces)

*Disinfects Herpes Simplex Virus Type 1 & 2,
Influenza A₂ (Hong Kong) Virus, Human Coronavirus
(HCoV) & HIV-1 (AIDS Virus)±

±Kills HIV-1 (AIDS virus) on precleaned environmental
surfaces/objects previously soiled with blood/body fluids.

(Ready to Use) (For Hospital & Institutional Use)
(SPRAY AND WIPE)

ACTIVE INGREDIENTS:

n-Alkyl (60% C ₁₄ , 30% C ₁₆ , 5% C ₁₂ , 5% C ₁₈)	
dimethyl benzyl ammonium chlorides.....	0.105%
n-Alkyl (68% C ₁₂ , 32% C ₁₄) dimethyl ethylbenzyl ammonium chlorides.....	0.105%
OTHER INGREDIENTS.....	99.790%
(TOTAL)	100.000%

(PRECAUCION AL CONSUMIDOR: Si usted no lee inglés, no
use este producto hasta que la etiqueta le haya sido expli-
cada ampliamente.)

KEEP OUT OF REACH OF CHILDREN
WARNING

See (back, rear, side) panel for additional precautionary statements.

Net Contents XXX oz (X qt) (XXX mL)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. Keep out of reach of children. Causes eye and skin irritation. Do not get in eyes, skin or on clothing. Harmful if swallowed.

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. **IF INHALED** - Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. **IF SWALLOWED** - Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. **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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. 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.) (Required on containers 5 gallons or larger.)

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE**-Keep containers tightly sealed when not in use. Store container indoors and in a dry area. Keep from freezing. Use from original container only.

CONTAINER DISPOSAL-Do not reuse empty container. Triple rinse empty container with water. Dispose in a sanitary landfill, incinerated, or if allowed by local authorities, by burning. If burned stay out of smoke. (For containers 1 gallon or less, do not reuse empty container (bottle, can, bucket). Wrap container and put in trash.)

PESTICIDE DISPOSAL-Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

(Buyer assumes all risk of use, storage or handling of this product not in strict accordance with directions given herewith.)

For Commercial/Institutional Use Only

EPA Reg. No. 11694-88 (-XXXX) EPA Est. No. 11694-KS-1

(Manufactured, Distributed, Sold) (in the USA) (by, for)

(For an MSDS, call XXX-XXX-XXXX or visit www.xxxxx.com and request document #xxxxx)

ACCEPTED
with COMMENTS

APR 19 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 11694-88

08/27/03
08032MV1
KRH

PRN 2001-6
PRN 2001-1
PRN 1995-1
PRN 1994-4

only for
15 gals
and
larger

3/3