

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 30 2000

Sunshine Makers, Inc.
15992 Pacific Coast Highway
Huntington Harbour, CA 92649

ATTENTION: Jim T. Hill, Ph.D.
Agent for Sunshine Makers, Inc.

SUBJECT: Simple Green d Antibacterial
EPA Registration Number 56782-2
Your Amendment Dated: July 7, 2000
EPA Received Date: July 10, 2000

The amendment referred to above, submitted in connection with registration under FIFRA Sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

The submitted Acute Dermal Toxicity Study (MRID 452028-01) and particle size determination study (MRID 451625-01) have been reviewed. The Acute Dermal Study is acceptable and has been assigned toxicity category IV. The submitted particle size study is sufficient to support a waiver of the requirement for an Acute Inhalation Toxicity study for Simple Green D. The assigned Acute Inhalation Toxicity category is IV based upon the lack of respirable particles and the lack of toxicity displayed in the acute oral and acute dermal toxicity studies.

CONCURRENCES

SYMBOL	7510C						
SURNAME	S. Hill						
DATE	10/25/00						

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The acute toxicity profile for this product is as follows:

Acute Oral	IV	Acceptable
Acute Dermal	IV	Acceptable
Acute Inhalation	IV	Waived
Primary Eye Irritation	III	Acceptable
Primary Skin Irritation	III	Acceptable
Dermal Sensitization	Nonsensitizer	Acceptable

A copy of the toxicology review is enclosed for your records.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

A. In the use statements for "Option 1: Uses Statement" for Simple Green Antibacterial Kitchen & Bathroom Cleaner/Disinfectant delete the surfaces "drain boards & covers" as each appears in the text of this section. Replace with the following terms: "dish draining boards" and "sink covers." Make the same correction to the use statements for "Option 2: Uses Statement" Crystal Simple Green D.

B. The following surfaces are not acceptable in the section "Option 2: Uses Statement" for Crystal Simple Green D: rubber, stone, brick, terra cotta, and stucco. Delete these surfaces from this section of the label. If you wish to add these surfaces at a later time for the use of this product indoors, submit an amendment which includes efficacy data for the use of this product on porous surfaces.

C. In the use statements for "Option 2: Uses Statement" Crystal Simple Green D revise to state "The following statement is required if label lists use on Medical Equipment: Bedframes, Bedpans, Gurneys, or Wheelchairs."

D. In the use statements for "Option 2: Uses Statement" Crystal Simple Green D revise "tile" to state "glazed tile."

E. Revise the "Option 3: Uses Statement" for D/2 Architectural Antimicrobial to read as follows such that this statement will clearly define the sites for use of this product. "For use on hard non-porous, washable surfaces. For use on: floors, walkways, walls, ceilings, counters, benches, tables, sinks, tubs, sculpture, decorative fountains, trash receptacles, spas, vats, tanks, machinery, gravestones, waste handling and storage areas of the following architectural structures: hospitals, schools, universities, churches, office buildings, libraries, museums, bridges, monuments, commercial, institutional and industrial facilities. Also add the following statement: "For use on the following outdoor surfaces: rubber, stone, brick, terra cotta, concrete and stucco."

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SURNAME								
DATE								

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F. In the statements for "Option 1 & 2: Directions for Use" for Simple Green Antibacterial Kitchen & Bathroom Cleaner/Disinfectant; Crystal Simple Green D make the following revisions. Revise to read "When used on food contact surfaces, follow with potable water rinse. Cover or remove food if present." Also revise to state "For Disinfecting and Deodorizing: Use full strength. 1. Pre-clean area to be disinfected or deodorized..."

G. In the statements for "Option 3: Directions for Use" for D/2 Architectural Antimicrobial make the following addition: "When used on food contact surfaces a pre-cleaning step is required and food must be covered or removed if present. Following use of this product on food contact surfaces, rinse with potable water."

H. In the statements for "Option 1, 2 & 3: Precautionary Statements" for Simple Green Antibacterial Kitchen & Bathroom Cleaner/Disinfectant; D/2 Architectural Antimicrobial; Crystal Simple Green D delete the statement "Avoid contamination of food or feed."

3. Submit two (2) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, this registration will be subject to cancellation in accordance with FIFRA sec. 6 (e). Your release for shipment of this product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510C)

Enclosures: Toxicity Review
 Stamped Label
7510C:T.Lantz:10/20 00:56782-2e

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

MASTER LABEL FOR SIMPLE GREEN D ANTIBACTERIAL EPA REGISTRATION 56782-2

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 30 2006

[FRONT PANEL]

Kills Most Bacteria* in 60 Seconds

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

registered under EPA Reg. No. 56782-2

[OPTION 1: ALTERNATE NAME (indoor/household)]
Simple Green Antibacterial
Kitchen & Bathroom Cleaner/Disinfectant

[OPTION 2: ALTERNATE NAME (indoor/commercial)]
Crystal Simple Green d
Institutional Cleaner/Disinfectant/Deodorizer

[OPTION 3: ALTERNATE NAME (indoor-outdoor/commercial)]
D/2 Architectural Antimicrobial

*Kills Salmonella choleraesuis, Pseudomonas aeruginosa, Escherichia coli, many gram positive/gram negative and odor-causing bacteria.

CAUTION:
KEEP OUT OF REACH OF CHILDREN.
See back panel for additional precautionary statements.

[OPTIONAL] - Please See Inside Pocket Label for International Translations.

ACTIVE INGREDIENTS:	
Octyl decyl dimethyl ammonium chloride	0.30%
Diocetyl dimethyl ammonium chloride	0.12%
Didecyl dimethyl ammonium chloride	0.18%
Alkyl (C14, 50%; C12, 40%; C16, 10%) dimethyl benzyl ammonium chloride	0.40%
INERT INGREDIENTS	99.00%
TOTAL.....	100.00%

OUNCES/GALLONS/LITRES

[BACK PANEL]

[OPTIONS 1 & 2: EFFICACY STATEMENT] SIMPLE GREEN ANTIBACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT; CRYSTAL SIMPLE GREEN D

Effective against a broad spectrum of bacteria: Salmonella choleraesuis, Staphylococcus aureus, Pseudomonas aeruginosa, Streptococcus pyogenes, Escherichia coli, and many gram positive/gram negative bacteria.

[OPTION 3: EFFICACY STATEMENT] D/2 ARCHITECTURAL ANTIMICROBIAL

D/2 is an easy-to-use liquid that kills and aids in the removal of a broad spectrum of bacteria. Effective against many gram positive/gram negative bacteria. Cleans mold, mildew and algae.

[OPTION 1: USES STATEMENT] SIMPLE GREEN ANTIBACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT

Non-damaging to non-porous, washable hard surfaces: walls, floors, counters, glazed tile, toilet seats and rims, sinks, tubs and showers, stove-tops, refrigerators, microwaves, drain boards & covers, trash receptacles, cutting boards, exercise equipment, and saunas.

[OPTION 2: USES STATEMENT] CRYSTAL SIMPLE GREEN D

For use on non-porous, washable hard surfaces: aluminum, chrome, fiberglass, linoleum, glazed porcelain and tile, rubber, concrete, stainless steel, stone, brick, terra cotta, and stucco found in: floors, walls, ceilings, counters, cutting boards, tables, sinks, tubs, showers, toilet & urinal seats rims and exteriors, stove-tops, refrigerators, microwaves, drain boards & covers, trash receptacles, rehabilitation and exercise equipment, spas, vats, tanks, conveyor belting, machinery, bed-frames, bedpans, gurneys, and wheelchairs. Use in hospitals, institutional kitchens, hotels, schools, offices, locker rooms, athletic centers, waste handling and storage areas.

[REGARDING OPTION 2 USES STATEMENT, THE FOLLOWING STATEMENT IS REQUIRED IF LABEL LISTS USE ON MEDICAL DEVICES, INCLUDING BEDFRAMES, BEDPANS, GURNEYS, OR WHEELCHAIRS]

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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfecting.

[OPTION 3: USES STATEMENT] D/2 ARCHITECTURAL ANTIMICROBIAL

For use on non-porous, washable hard surfaces: floors, walkways, walls, ceilings, counters, benches, tables, sinks, tubs, trash receptacles, spas, vats, tanks, sculpture, monuments, decorative fountains, gravestones, machinery, waste handling and storage areas.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 30 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No 56782-2

ACCEPTED
with COMMENTS
in EPA Letter Dated:
OCT 30 2000

[BACK PANEL - CONT'D]

**[OPTIONS 1 & 2: DIRECTIONS FOR USE] SIMPLE GREEN ANTIBACTERIAL
KITCHEN & BATHROOM CLEANER/DISINFECTANT; CRYSTAL SIMPLE GREEN D**

DIRECTIONS FOR USE

- ◆ It is a violation of federal law to use this product in a manner inconsistent with its labeling.
- ◆ Drain water from spas and saunas before using this product.
- ◆ When used on food contact surfaces, rinse with potable water. Cover or remove food if present.

For disinfecting: *Use full strength.* 1. Pre-clean area to be disinfected as instructed by the general cleaning directions below. 2. Apply [*Simple Green d Antibacterial*] with sponge, mop or coarse spray. 3. Wait 60 seconds. 4. Rinse or wipe off.

For general cleaning: 1. Mix 1:20 solution: -----

Simple Green d Antibacterial	TO	Water
¼ Cup	TO	5 Cups
6.5 ozs.	TO	(1-gallon) 128 ozs.

2. Apply to surface with sponge, mop or coarse spray.
3. Rinse or wipe off.
4. For glass cleaning: Mix 1:150 solution (1 teaspoon of [*Simple Green d Antibacterial*] to 24 oz. spray bottle filled with water). Apply. Wipe dry.

Fungicide, and Rodenticide Act, amended, for the pesticide, consistent with its labeling. 56782-2

[OPTION 3: DIRECTIONS FOR USE] D/2 ARCHITECTURAL ANTIMICROBIAL

DIRECTIONS FOR USE

- ◆ It is a violation of federal law to use this product in a manner inconsistent with its labeling.
 - ◆ Drain water from architectural structures before application of this product.
- Use full strength.* 1. Remove loose soiling with a dry brush. 2. Apply D/2 to hard surface with brush, roller or coarse spray until thoroughly wet. 3. Allow D/2 to remain on surface for at least 60 seconds. 4. Apply additional product to maintain wet surface, and scrub thoroughly with a non-metallic, short-fibered scrub brush. 5. Mist with water and continue scrubbing. 6. Rinse thoroughly with potable water. (1 gallon treats 350 to 400 sq. ft.)

[OPTION 1: STORAGE & DISPOSAL] SIMPLE GREEN ANTIBACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT (For containers ≤ 1 gallon)

STORAGE AND DISPOSAL:

Disposal: Do not reuse empty container. Rinse container thoroughly and offer for recycling or discard in trash.

Storage: Store at normal room temperature.

[OPTION 2 AND 3: STORAGE & DISPOSAL] D/2 ARCHITECTURAL ANTIMICROBIAL; CRYSTAL SIMPLE GREEN D (For containers ≥ 5 gallon)

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store at normal room temperature in tightly closed container and secure area inaccessible to children and away from food and feed.

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

Container Disposal: Do not reuse empty container. Triple rinse (or equivalent) container, then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke.

[BACK PANEL - CONT'D]

[OPTION 1, 2 AND 3: PRECAUTIONARY STATEMENTS] SIMPLE GREEN ANTI-BACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT; D/2 ARCHITECTURAL ANTIMICROBIAL; CRYSTAL SIMPLE GREEN D

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals:
CAUTION. Keep Out of Reach of Children. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Avoid contamination of food or feed.

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 first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
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.

[OPTIONS 2 AND 3: ENVIRONMENTAL HAZARDS STATEMENT]

D/2 ARCHITECTURAL ANTIMICROBIAL; CRYSTAL SIMPLE GREEN D
(For all containers)

Environmental Hazards Statement: This product is toxic to fish. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment wash-water. Do not use on boats or other structures that come into direct contact with aquatic environments, such as concrete pilings. 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.

U.S. EPA Registration No. 56782-2
U.S. EPA Establishment No. 40873-GA-01
U.S. EPA Establishment No. 40873-CA-01

Questions? Call toll free in the U.S. and Canada 1-800-228-0709
Made in the U.S.A.
1998 Sunshine Makers, Inc. - P.O. Box 2708, Huntington Beach, CA 92647
www.simplegreen.com

-END-

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 30 2000

Revised: June 19, 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 56782-2