

Carol Chapin
Environmental & Regulatory Coordinator
Sunshine Makers, Inc.
15922 Pacific Coast Hwy.
Huntington Beach, CA 92649

NOV 17 2003

Subject: Simple Green d Antibacterial
EPA Registration Number 56782-2
Application Date: August 18, 2003
Receipt Date: August 20, 2003

Dear Ms. Chapin,

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Revision of Master Label as per PR Notice 2001-1

Conditions

Revise the label as follows:

Make the following corrections to the first page of the label:

1. Add the following qualifier to this page as it appears on the last stamped label:
** Kills Salmonella choleraesuis, Pseudomonas aeruginosa, Escherichia coli, many gram positive/gram negative and odor causing bacteria."

2. The alternate brand name "Advance Simple Green" is not acceptable as it implies heightened efficacy. Delete this name from the label.

Make the following corrections to the second page of the label:

1. As stated in the 4/18/03 Agency letter, revise Option 1 & 2 Use Statements to clarify that this product is for use on the "exterior surfaces of refrigerators and microwaves."

CONCURRENCES

SYMBOL	N 7510c						
SURNAME	J. J. [Signature]						
DATE	11/17/03						

2. Revise the Option 2 Uses Statement by deleting "fiberglass" which is a porous surface. In a future submission you may add fiberglass to the label by associating it with specific surfaces which are made of fiberglass and are by their nature hard non-porous such as shower stalls and bathtubs.

3. Revise the heading for the Option 2 Use Statement to read: "The following statement is required if label lists use on medical equipment: bedframes, bedpans, gurneys, wheelchairs, or hospitals and stainless steel, chrome, or aluminum surfaces."

Make the following corrections to the third page of the label:

1. Delete the entire section beginning: "[Option 2: Directions for Use] Crystal Simple Green D" and ending "For glass cleaning...Wipe dry." as these revised directions have not been supported by data as per the Agency letters of 1/28/03, 4/18/03, and 5/22/03.

2. Revise the heading on the "[Option 1: Directions for Use] Simple Green Antibacterial Kitchen & Bathroom Cleaner/Disinfectant" to read as per the last stamped label as follows: "[Options 1 & 2: Directions for Use] Simple Green Antibacterial Kitchen & Bathroom Cleaner/Disinfectant; Crystal Simple Green D"

Make the following correction to the fifth page of the label:

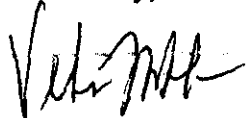
As per the Agency letter of 5/22/03, revise the Environmental Hazards Statement for options 2 and 3 to be in agreement with the statement which was previously accepted for this product on 10/30/2000 to include the following: "...Do not use on boats or other structures that come into direct contact with aquatic environments, such as concrete pilings..."

General Comments

A stamped copy of the accepted 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 Tracy Lantz at (703) 308-6415.

Sincerely,



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

Enclosure: Stamped Label

7510C:T.Lantz:11/14/03:56782-21

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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

*Note: Items inside borders constitute text to be printed on the label.

[FRONT PANEL]

When Used Full Strength, Kills Bacteria* in 60 Seconds

[OPTION 1: ALTERNATE NAME (indoor/household)]

Simple Green Antibacterial
Kitchen & Bathroom Cleaner/Disinfectant

(ABN)

Simple Green MultiSurface Antibacterial Cleaner/Disinfectant

[OPTION 2: ALTERNATE NAME (indoor/commercial)]

Crystal Simple Green d
Institutional Cleaner/Disinfectant/Deodorizer

(ABNs)

~~Simple Green~~
Simple Green Food Service Cleaner/Disinfectant

[OPTION 3: ALTERNATE NAME (indoor-outdoor/commercial)]

D/2 Architectural Antimicrobial

[OPTIONAL]

Please See Inside Pocket Label for International Translations.

ACTIVE INGREDIENTS:

Octyl decyl ammonium chloride	0.30%
Octyl 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

TOTAL.....	99.00%
	100.00%

KEEP OUT OF REACH OF CHILDREN.

CAUTION:

See back panel for additional precautionary statements.

OUNCES/GALLONS/LITRES

ACCEPTED
with COMMENTS
in EPA Letter Dated:
NOV 17 2003
Under the Federal Insecticide,
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amended, for the pesticide,
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[BACK PANEL]**[OPTIONS 1 & 2: EFFICACY STATEMENT] SIMPLE GREEN ANTIBACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT; CRYSTAL SIMPLE GREEN D**

When used according to label instructions, this product kills* Escherichia coli, Streptococcus pyogenes, Salmonella choleraesuis, Staphylococcus aureus, and Pseudomonas aeruginosa on hard, nonporous surfaces.

[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, dish draining boards, sink 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, ~~linoleum~~, linoleum, glazed tile, glazed porcelain, stainless steel and concrete found in: floors, walls, ceilings, counters, cutting boards, tables, sinks, tubs, showers, toilet & urinal seats rims and exteriors, stove-tops, refrigerators, microwaves, dish draining boards, sink 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 EQUIPMENT: 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) 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 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. For use on the following outdoor surfaces: rubber, stone, brick, terra cotta, concrete and stucco.

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56782-2

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[BACK PANEL - CONT'D]

[OPTION 1: DIRECTIONS FOR USE] SIMPLE GREEN ANTIBACTERIAL KITCHEN & BATHROOM CLEANER/DISINFECTANT

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, follow with potable water rinse. Cover or remove food if present.

For disinfecting & deodorizing:

Use full strength. 1. Pre-clean area to be disinfected and deodorized 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: -----
 2. Apply to surface with sponge, mop or coarse spray.
 - Rinse or wipe off.

Simple Green d Antibacterial	
$\frac{1}{4}$ Cup	5 Cups
6.5 ozs.	(1-gallon) 128 ozs.

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.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]

[REDACTED]

Simple Green d Antibacterial	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

in EPA letter Dated.

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[BACK PANEL - CONT'D]

[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.
- 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.
- 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 or local authorities by burning. If burned stay out of smoke.

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

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals:

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

FIRST AID:

HAVE THE PRODUCT CONTAINER OR LABEL WITH YOU WHEN CALLING A POISON CONTROL CENTER OR DOCTOR, OR GOING FOR TREATMENT.

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.

[BACK PANEL - CONT'D]

[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. 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.
2003 Sunshine Makers, Inc. - P.O. Box 2708, Huntington Beach, CA 92647
www.simplegreen.com

-END-

It is our intent to possibly offer this label in bilingual format: English/Spanish and English/French. All verbiage would be directly translated and would be located side-by-side with its English equivalent. (11/06/03)

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