

64240-44

7/18/2012

1 of 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

July 18 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Georgia Anastasiou
Agent for Combat Insect Control Systems
Lewis & Harrison
122 C Street N W Suite 740
Washington D C 20001

Subject Soft Scrub® with Bleach
EPA Reg# 64240 44
Notification Date June 19 2012
Receipt Date June 20 2012

Dear Ms Anastasiou

This acknowledges the receipt of your notification submitted under the provision of PR Notice 98 10 and FIFRA section 3(c)9

Proposed Notification

Minor addition of labeling claims for Soft Scrub® with Bleach (EPA Reg# 64240 44)
Label version June 19 2012 (pin punch 6/20/12)

General Comment

Based on the review of the material submitted the additional marketing label claims for Soft Scrub® with Bleach (EPA Reg#64240 44) are acceptable

This notification and this letter have been inserted in your file for future reference

If you have further question on this letter please contact David Liem at 703 305 1284 or by email at liem.david@epa.gov

Sincerely

A handwritten signature in black ink, appearing to read "Monisha Harris".

Monisha Harris
Acting Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
Washington DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide – Section I

1 Company/Product Number 64240 44	2 EPA Product Manager Monisha Harris	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Soft Scrub with Bleach	PM# 32	
5 Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc 19001 N Scottsdale Rd Scottsdale AZ 85255 <u>PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW</u> <input type="checkbox"/> Check if this is a new address	6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(I) my product is similar or identical in composition and labeling to EPA Reg No Product Name	

Section – II

Amendment – Explain below
 Resubmission in response to Agency letter dated _____
 Notification – Explain below

Final printed labels in response to Agency letter dated _____
 Me Too Application
 Other – Explain below

Explanation Use additional page(s) if necessary (For Section I and Section II)
Notification to make minor changes to the marketing language
Notification in Accordanc With PR Notic 98 10 This notification is consistent with the provisions of PR Notice 98 10 EPA regulations at 40 CFR 152.46 and no other changes have been made to the labelin or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to wilfully make any false statement to LPA I further understand that if this notif cation is not consistent with the terms of PR Notice 95 2 and 40 CFR 152.46 this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA

Section III

1 Material This Product Will Be Packaged In				2 Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If Yes Unit Packaging wgt No per container		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
Certification must be submitted		If Yes Package wgt No per container			
3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4 Size(s) Retail Container 12 oz 24 oz 36 oz	5 Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product			
6 Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other <u>Shrink sleeve (plastic)</u> <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section IV

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)

Name Georgia Anastasiou Lewis & Harrison 122 C Street NW – Suite 740 Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No (Include Area Code) 202 393 3903 x19
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Certification
I certify that the statements I have made on this form and all attachments thereto are true accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law

2 Signature <i>Georgia Anastasiou</i>	3 Title Agent for Combat Insect Control Systems	6 Date Application Received (Stamped)
4 Typed Name Georgia Anastasiou	5 Date June 19 2012	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street N W Suite 740
Washington D C 20001
telephone 202 393 3903
fax 202 393 3906

June 19 2012

VIA COURIER

Document Processing Desk
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
One Potomac Yard Room S4900
2777 S Crystal Drive
Arlington VA 22202 4501

ATTENTION **Monisha Harris**
 Product Manager #32

SUBJECT **Combat Insect Control Systems**
 Soft Scrub with Bleach (EPA Reg No 64240 44)
 Notification per PR Notice 98 10

Dear Ms Harris

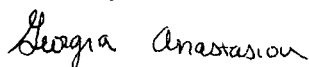
On behalf of Combat Insect Control Systems I am submitting a notification to make minor changes to the marketing language for the product **Soft Scrub with Bleach (EPA Reg No 64240 44)** The changes are highlighted on the enclosed label

Enclosed please find the following documents to support this submission

- 1 Application for Pesticide
- 2 One (1) copy of the revised label with changes highlighted and
- 3 Two (2) copies of the revised label

If you have any questions and/or comments about the enclosed submission please feel free contact me by phone at 202 393 3903 (ext 19) or by email at georgia@lewisharrison.com

Sincerely



Georgia Anastasiou
Agent for
Combat Insect Control Systems

cc Patricia McFadden (Combat)

Note **Italicized text is information for the reader and is not part of the label**
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Highlighted text is new

EPA Reg No 64240-44
Soft Scrub with Bleach
Pg 1 of 7
June 19 2012

SOFT SCRUB® WITH BLEACH

ACTIVE INGREDIENT	
SODIUM HYPOCHLORITE	1 1%
OTHER INGREDIENTS	98 9%
TOTAL	100 0%

KEEP OUT OF REACH OF CHILDREN

WARNING

[Read back panel carefully]
[See back panel for additional precautionary statements]
[See precautionary statements on back panel]

NOTIFICATION
Date Reviewed 7/18/12
Reviewed By [Signature]

Net [Contents] [Weight] _____

Note **Bold Italicized text is information for the reader and is not part of the label**
[Bracketed format is photo letter]
Highlighted text is new

EPA Reg No 64240-44
Soft Scrub with Bleach
Pg 2 of 7
June 19 2012

PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

WARNING Causes eye irritation Do not get in eyes May cause skin irritation For sensitive skin or prolonged use wear gloves

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 and continue rinsing eye

IF ON SKIN OR CLOTHING Take off contaminated clothing Rinse skin immediately with plenty of water for 15 20 minutes In either case call a poison control center or doctor for treatment advice

IF SWALLOWED Call a poison control center or doctor immediately for treatment advice Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor Do not give anything by mouth to an unconscious person Have the product container or label with you when calling a poison control center or doctor or going for treatment

Physical & Chemical Hazards Contains bleach Avoid contact with clothes fabric or carpet Do not use or mix with [other] [household] cleaning products [or other chemicals] as hazardous gases may result

{Note to Reviewer Per PR-Notice 2007-4 this product will receive a batch code The number will be laser-coded or otherwise imprinted on the primary package }

Quality from **Henkel**

-or-

Quality & Responsibility **Henkel**

Worldwide for more than 125 years our brands have combined quality with respect for people and the environment. The original Henkel brand for today and tomorrow.

-or-

Quality & Responsibility **Henkel**

UPC bar code

[Distributed by] Combat Insect Control Systems
[19001 N Scottsdale Rd] SCOTTSDALE AZ 85255
MADE IN THE U S A

Questions or comments? Call 1 800 290 0158
[Or visit us at www.softscrub.com]

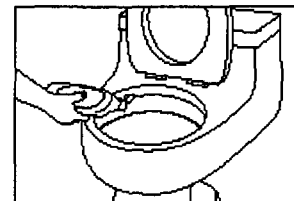
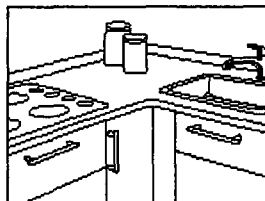
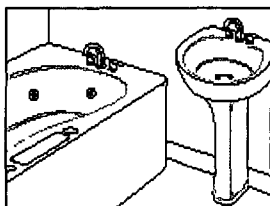
[The distinctive design and elements of this package are proprietary and owned by]
[contains no photo phorus]

EPA Reg No 64240 44
EPA Est No _____

Note **Bold Italicized text is informat** or the reader and is not part of the label
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EPA Reg No 64240-44
Soft Scrub with Bleach
Pg 3 of 7
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May include the following or other illustrations or graphic depictions of the container in use or other usage sites as permitted by accepted label claims



DIRECTIONS FOR [HOUSEHOLD] USE It is a violation of federal law to use this product in a manner inconsistent with its labeling

SHAKE [THOROUGHLY] BEFORE USE

To clean Squeeze directly onto [tough stains] [surface] or onto damp sponge Rub [to wet all surfaces thoroughly] Rinse or wipe clean

To disinfect toilet bowl Flush Apply [1/2 cup] [4 oz] of product to sides of bowl to kill gram negative bacteria Brush to wet all surfaces thoroughly including under the rim Let stand 10 minutes before flushing

To disinfect hard nonporous surfaces Apply at full strength and leave on 3 minutes [before wiping clean] For heavy soil preclean surface before disinfecting

To remove mold and mildew Leave on 5 minutes Rinse or wipe clean For heavy soil preclean surface before applying product

Close cap after use [If product will not [release] [dispense] [squeeze bottle sides] [briefly unscrew cap] to allow air into bottle]

ATTENTION For use on sinks tubs showers glazed tile counters toilets Prolonged contact on delicate surfaces may cause discoloration Rinse promptly after standing time On delicate surfaces that may scratch like plastic appliance enamel fiberglass cultured marble and natural stone Use sparingly rub gently with a damp sponge rinse Do not use on copper brass silver aluminum wood painted surfaces or rubber items For unfamiliar surfaces test in a small inconspicuous area first

Note to Reviewer

Below are the Storage & Disposal Statements for Product Distributed Only for Household Residential Use

Storage & Disposal

Store in a cool well ventilated area inaccessible to small children and pets Non refillable container Do not re use or refill this container Offer for recycling if available or discard in trash

Note to Reviewer

Below are the Storage & Disposal Statements for Product Distributed for All Uses Other Than Household Residential Use

Storage & Disposal

Do not contaminate water food or feed by storage and disposal

Pesticide Storage Store in a cool well ventilated area inaccessible to small children and pets

Pesticide Disposal To avoid wastes use all material in this container by application according to label directions If wastes cannot be avoided offer remaining product to a waste disposal facility or pesticide disposal program

Container Handling Nonrefillable container Do not reuse or refill this container Offer for recycling if available or discard in trash

Note **Bold Italicized text is informat** or the reader and is not part of the label
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EPA Reg No 64240-44
Soft Scrub with Bleach
Pg 4 of 7
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Optional Claims for Front or Back Panel

Disinfectancy related bullets/bursts/sentences

- 1 Bleaches out stains & disinfects
- 2 Mild Abrasive [Cream] [Cleaner] [Cleanser]
- 3 Antibacterial [Cream] [Cleaner] [Cleanser]
- 4 Kills [odor causing] [Bacteria] [Germs]
- 5 Kills germs while it cleans
- 6 Disinfectant
- 7 Disinfecting [Cream] [Cleaner] [Cleanser]
- 8 Disinfects [As It Cleans]
- 9 Disinfects & Deodorizes
- 10 Disinfects And Deodorizes By Killing [Germs] [Bacteria] and Their Odors
- 11 Multi Purpose Disinfectant
- 12 [Multi Room] [Multi Room] [Multi Purpose] [Multi Purpose] [Multi Use] [All Purpose] [All Purpose] [Multi Surface] [Multi Surface] [Everyday] [Original] [Power] [Cream] [Cleanser] [Cleaner]
- 13 Kills the Following Microorganisms Salmonella enterica (Salmonella) **and/or** Pseudomonas aeruginosa (Pseudomonas) **and/or** Staphylococcus aureus (Staph) **and/or** Streptococcus pyogenes (Strep) **and/or** Athlete s foot fungus [Trichophyton mentagrophytes] in 3 minutes at full strength
- 14 Antibacterial [Action]
- 15 Kills 99.9% [of household] germs* [Salmonella enterica (Salmonella) **and/or** Pseudomonas aeruginosa (Pseudomonas) **and/or** Staphylococcus aureus (Staph) **and/or** Streptococcus pyogenes (Strep) **and/or** Trichophyton mentagrophytes (Athlete s Foot Fungus)] in 3 minutes at full strength
- 16 [Bleach] Disinfectant [Cream] [Cleaner] [Cleanser]
- 17 Disinfecting Bleach [Cream] [Cleaner] [Cleanser]
- 18 Home Disinfectant [Cream] [Cleaner] [Cleanser]
- 19 One Step [Cream] [Cleaner] [Cleanser] and Disinfectant
- 20 Cleans and disinfects in one step
- 21 Leaves Surfaces Sanitary
- 22 [Eliminates] [Wipes out] odors caused by [bacteria] [germs] [microorganisms]
- 23 Removes mold and mildew [stains]
- 24 [Fungicide] [Fungicidal]
- 25 [Bactericide] [Bactericidal]
- 26 [Germicide] [Germicidal]
- 27 [Virucide] [Virucidal]
- 28 Cleans and kills germs* [on hard nonporous surface] [**surface option(s) from List A**] [in one step] *Salmonella enterica (Salmonella) **and/or** Pseudomonas aeruginosa (Pseudomonas) **and/or** Staphylococcus aureus (Staph) **and/or** Streptococcus pyogenes (Strep) **and/or** Trichophyton mentagrophytes (Athlete s Foot Fungus)]
- 29 [**surface option from List A**] disinfectant
- 30 Disinfects [**surface option(s) from List A**]
- 31 [An] Effective [disinfectant] [cleanser] [deodorant] [for] [in] [at] [**surface options from List A**]
- 32 One step [Cream] [Cleaner] [Cleanser] [Disinfectant] Kills germs while it cleans! Kills common [household] [germs] [bacteria] **or** Salmonella enterica (Salmonella) **or** Pseudomonas aeruginosa (Pseudomonas) **or** Staphylococcus aureus (Staph) **or** Streptococcus pyogenes (Strep) **or** Trichophyton mentagrophytes [Athlete s Foot Fungus] [on] [in] [at] [**option from List A**] in 3 minutes at full strength
- 33 Hospital Disinfectant [Cream] [Cleaner] [Cleanser]
- 34 Industrial Disinfectant [Cream] [Cleaner] [Cleanser]
- 35 Institutional Disinfectant [Cream] [Cleaner] [Cleanser]
- 36 Healthcare Disinfectant [Cream] [Cleaner] [Cleanser]
- 37 Kills Rhinovirus [Type 39] in 3 Minutes [at full strength]
- 38 Kills Influenza A [Virus] in 3 Minutes [at full strength]

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Soft Scrub with Bleach
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Optional Claims for Front or Back Panel

Disinfectancy related bullets/bursts/sentences

- 1 [Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus [This product] [***OR ACCEPTED ABN***] is a broad spectrum hard surface disinfectant that has been shown to be effective against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu)]
- 2 [[This product] [***OR ACCEPTED ABN***] has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus]
- 3 [[This product] [***OR ACCEPTED ABN***] has demonstrated effectiveness against influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu)]
- 4 [Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu)]
- 5 [Kills Pandemic 2009 H1N1 influenza A virus]

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EPA Reg No 64240-44
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Optional Claims for Front or Back Panel

Non disinfectancy (cleaning and/or marketing) related bullets/bursts/sentences

1 [Cleans] [Fights] [Removes] [tough] stains	17 Multi surface [cream] [cleaner] [cleanser]	32 Value Size
2 Commercial	18 Tough cleaning [action] [power]	33 Bonus Size
3 Custodian/Custodial	19 Thick formula sticks to stains	34 The Ultimate Clean [!]
4 Deodorizes	20 [Great] [Good] for heavy duty cleaning	35 A Clean You Can Trust [!]
5 Food Service	21 Grease Cutting	36 A Clean You Can See and Feel [!]
6 [Gently] Bleaches out tough stains	22 Brightens as it cleans	37 Great Value
7 [Has] [With] [a] [the] [clean] [pleasant] [fresh] [Mountain Breeze] [Original] [Fresh] [scent] [fragrance]	23 Stain fighting [power] [action]	38 The Power of Bleach The Clean of Soft Scrub
8 [Mountain Breeze] [Original] [Fresh] [scent] [fragrance]	24 [Wow] Easy Squeeze	39 A Product [of] [in] [the] [Dial] [Henkel] Professional [Products] Series
9 Industrial	25 [Wow] Clean Squeeze	40 Henkel Consumer Goods Inc
10 Institutional	26 Bleach Power [Cream] [Cleanser] [Cleaner]	41 [Dial] [Henkel] [Commercial] [Professional] [Products] [Series]
11 Stain Fighting	27 Cream [Cream Cleanser]	42 [Improved] Stain Fighting
12 The power of bleach with a [great] [clean] [fresh] scent	28 Bleach Prominence	43 Tough stain fighter
13 Tough on [stains] [grease] [soap scum]	29 All Purpose	44 For Bath and Kitchen
14 Tough on greasy dirt [and] mildew stains [and] soap scum	30 Good for [whitening] [brightening] surfaces	
15 [Wow] Stay Clean Cap	31 Gentle on Surfaces See Directions (ATTENTION)	
16 The Power of Soft Scrub with [a] [Clean] [Fresh] [Mountain Breeze] [the] [Original] [Fresh] Scent		

[Removes] [Cleans [Away]]

1 [Bathroom] soils	9 Bathtub rings	19 [Toilet] Rust
2 [Food] [coffee] [tea] [mildew] [juice] stains	10 Fingerprints	20 Limescale
3 [General household] dirt	11 [Smudges]	21 Calcium
4 [Hard] water deposits	12 Grime	22 Kitchen Stains
5 [Tough] [Greasy] dirt	13 Mineral deposits	23 [Bathroom] [Kitchen] [Food] Soils
6 Tough [stains] [soils]	14 Pot marks	24 [Tough] [Burnt on] [Dried] Food
7 Bathroom dirt	15 Soap scum	25 Grout
8 Bathroom stains	16 Toilet ring[s]	
	17 Mold and Mildew Stains	
	18 [Tough] Grease [and Grime]	

Other Optional Claims To be used only upon consent of the relevant third party

[Good Housekeeping Seal of Approval]



[NSF Listed]



[Follow us on Facebook]



[KOSHER] [U]

[Kosher symbol of The Union of Orthodox Jewish Congregations]

Note **Bold Italicized text is information for the reader and is not part of the label**
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EPA Reg No 64240-44
Soft Scrub with Bleach
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Front or Back Label

List A Surface Options

Hard Nonporous Surfaces for Disinfecting and Cleaning

- | | | |
|---|--|--|
| 1 [Bath] Tub
[Imitation]
[Cultured] | 9 [Sealed] Fiberglass | 18 Nonporous [Hard] [Solid]
[Engineered] Surfaces |
| [Synthetic] marble | 10 Glass [Shower] [Doors] | 19 Outdoor Furniture |
| 2 Inside [and]
[Outside] [of]
Dishwashers | 11 Plastic Laminate [Formica] | 20 Oven doors |
| 3 Inside [and]
[Outside] [of]
Microwaves | 12 Glazed [Ceramic] tile | 21 Sealed Granite |
| 4 Inside [and]
[Outside] [of]
Refrigerators | 13 Glazed Porcelain | 22 Shower [stalls] [walls] |
| 5 Bathroom [sink]
[countertop]
[counter] [glazed
tile] [floors] [fixtures]
[appliances] | 14 Hard surface floors | 23 Stainless Steel |
| 6 Garbage Can[s] | 15 Kitchen [sink] [countertop]
[counter] [glazed tile]
[floors] [fixtures]
[appliances] | 24 Stove Tops |
| 7 Trash Can[s] | 16 Locker rooms | 25 Tabletops |
| 8 Waste
Receptacle[s] | 17 Non food contact | 26 Toilets |
| | | 27 Glass top Stove[s] |
| | | 28 Vinyl |
| | | 29 Quartz [counter top[s]] [surfaces] |

Locations for Disinfecting and Cleaning

- | | | |
|-----------------|--|--------------------------------------|
| 1 Hospitals | 5 Industrial facilities | 11 Public transportation |
| 2 Healthcare | 6 Manufacturing
[facilities][plants][Manufactu
rers] | 12 Office buildings |
| 3 Nursing homes | 7 [Hotels] [Motels] | 13 Day care [centers][facilities] |
| 4 Institutions | 8 Correctional institutes | 14 [Schools][Colleges][Universities] |
| | 9 Detention
[Centers][Facilities] | 15 Sports facilities |
| | 10 Prisons | 16 Health clubs |

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 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 of high-level disinfection.

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