

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

November 2, 2022

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Georgia Anastasiou Agent for Combat Insect Control Systems c/o Lewis & Harrison, LLC Electronic Transmittal: georgia@lewisharrison.com

Subject:	Notification per PRN 98-10 – Application to Revise Marketing Claims.
	Product Name: "Soft Scrub with Bleach"
	EPA Registration Number: 64240-44
	Received Date: March 16, 2022
	Action Case Number: 00346995

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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 the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. 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. 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.

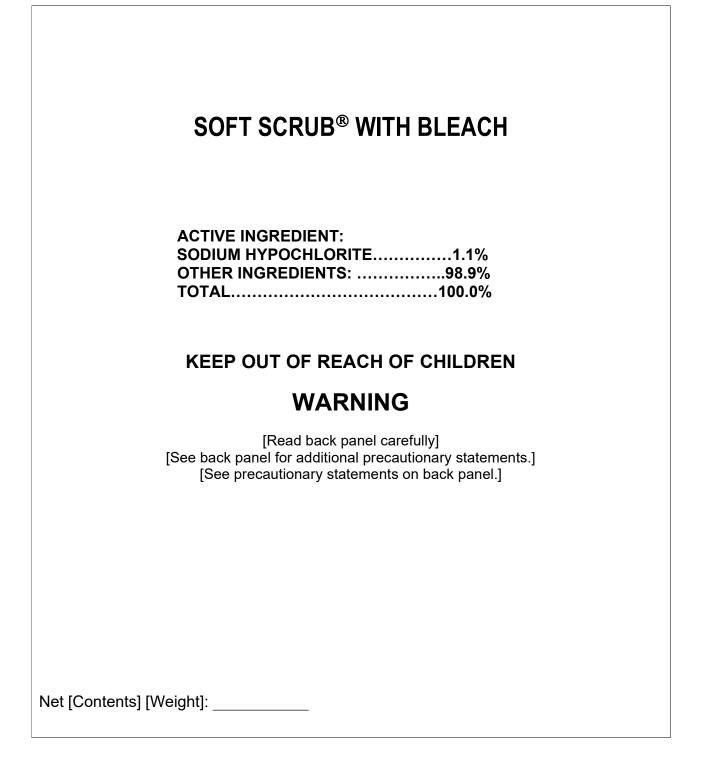
If you have any questions, you may contact Michael Varco at 202-566-0667 or via email at Varco.Michael@epa.gov.

Sincerely,

inter

Demson Fuller, Product Manager 32 Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

for



NOTIFICATION

64240-44

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/02/2022

### PRECAUTIONARY STATEMENTS: Hazards to Humans (&) (and) Domestic Animals.

**WARNING**: Causes substantial but temporary eye injury. Do not get in eyes on skin or (on) clothing. May cause skin irritation. For sensitive skin or prolonged use, wear gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or going to the toilet. Remove and wash contaminated clothing before reuse.

First Aid:

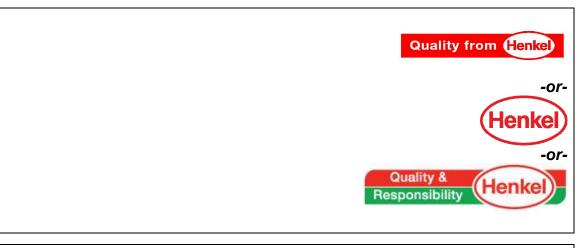
**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes and continue rinsing eye.

**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.}* 



#### UPC bar code

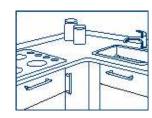
[Distributed by] & © [year] Combat Insect Control Systems [One Henkel Way] Rocky Hill, CT 06067 MADE IN THE U.S.A. Questions or comments? Call 1-800-290-0158 [Or visit [us at] www.softscrub.com] [The distinctive design and elements of this package are proprietary and owned by:] [All trademarks and the distinctive design and elements of this package are proprietary to and owned by Henkel and its affiliates in the U.S. and elsewhere.] [Contains no phosphorus] EPA Reg. No. 64240-44 EPA Est. No.

Beginning of Batch Code indicates Est. No.

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.









Sponge image



Clock image to be used only with cleaning 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 (a) damp sponge. Rub [to visibly wet all surfaces thoroughly]. Rinse or wipe clean.

**To disinfect toilet bowl**: Flush. Apply [½ cup] [4 oz] of product to sides of bowl to kill gram-negative bacteria. Brush to visibly 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 visible soil, pre-clean surface before disinfecting.

**To remove stains caused by mold and mildew:** Leave on 5 minutes. Rinse or wipe clean. For visible soil, pre-clean 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, sealed fiberglass, sealed cultured marble, and sealed 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.

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:** Non-refillable container. Do not re-use or refill this container. Offer for recycling if available or discard in trash.

Optional Claims for Front or Back Panel			
' Disinfectancy-related bullets/bursts/sentences:			
	Bleaches out stains & disinfects		
	Mild Abrasive [Cream] [Cleanser]		
	Antibacterial [Cream] [Cleaner] [Cleanser]		
	Kills [odor-causing] [Bacteria] [Germs]		
5.	Kills germs while it cleans***		
	Disinfectant		
	Disinfecting [Cream] [Cleaner] [Cleanser]		
	Disinfects [As It Cleans]***		
	Disinfects & Deodorizes		
	Disinfects And Deodorizes By Killing [Germs] [Bacteria] and Their Odors		
	Multi-Purpose Disinfectant		
	[Multi-Room] [Multi Room] [Multi-Purpose] [Multi Purpose] [Multi-Use] [Multi-Surface] [Multi Surface]		
12.	[Everyday] [Original] [Power] [Cream] [Cleanser] [Cleaner]		
13	Kills [the Following] Microorganisms: Salmonella enterica [Salmonella] -and/or- Pseudomonas		
10.	aeruginosa [Pseudomonas] -and/or- Staphylococcus aureus [Staph] -and/or- Streptococcus		
	pyogenes [Strep] -and/or- Athlete's foot fungus (Trichophyton interdigitale) -and/or- **Rhinovirus		
	(Type 39) -and/or- **Influenza A [Virus] [in 3 minutes] [at full strength]		
11	Antibacterial [Action]		
	Kills [99.9%] [of] [household] germs[:*] [including/and **COVID-19 Virus† or **SARS-CoV-2 <mark>†</mark> ]		
'0.	[Salmonella enterica (Salmonella) and/or Pseudomonas aeruginosa (Pseudomonas) and/or		
	Staphylococcus aureus (Staph) and/or Streptococcus pyogenes (Strep) or] and/or Trichophyton		
	interdigitale (Athlete's Foot Fungus)] in 3 minutes at full strength		
16	[Bleach] Disinfectant [Cream] [Cleaner] [Cleanser]		
	Disinfecting Bleach [Cream] [Cleaner] [Cleanser]		
	Disinfectant [Cream] [Cleaner] [Cleanser]		
	Commercial Cleanser		
	One Step [Cream] [Cleaner] [Cleanser] and Disinfectant***		
	Cleans and disinfects in one step***		
	Leaves Surfaces Cleaned		
	[Eliminates] [Wipes out] odors caused by [bacteria] [germs] [microorganisms]		
	Removes mold and mildew stains		
	[Fungicide] [Fungicidal]		
	[Bactericide] [Bactericidal]		
	[Germicide] [Germicidal]		
	[Virucide**] [Virucidal**] ** Rhinovirus (Type 39) <i>-and/or-</i> **Influenza A Virus <i>and/or</i> **SARS-		
20.	CoV-2 <sup>+</sup> (The ** qualifier will only appear before a virus name when the words Virucide** or		
	Virucidal** are used on the label)		
29.	[Cleans and kills germs][*] [on hard, nonporous surface] [in one step] [*Salmonella enterica		
	(Salmonella) and/or Pseudomonas aeruginosa (Pseudomonas) and/or Staphylococcus aureus		
	(Staph) and/or Streptococcus pyogenes (Strep) or] and/or Trichophyton interdigitale (Athlete's Foot		
	Fungus)]		
30.	[surface option from List A] disinfectant		
	Disinfects [surface option(s) from List A]		
	[An] Effective [disinfectant] [cleanser] [deodorant] [for] [in] [at] [ <i>surface options from List A</i> ]		
	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 interdigitale [Athletes Foot Fungus] [on] [in] [at] [option from List A] in 3 minutes at full		
	strength		
34	Soft Scrub® with Bleach is a mild abrasive cleanser for [sinks, tubs, showers, glazed tile, counters		
	and toilets] [stainless steel, sealed granite, sealed fiberglass, plastic laminate and glass-top stoves[*]		
	[*]at room temperature]. [The thick formula sticks to stains and cleans and kills 99.9% of germs*		
	found on surfaces][.] [like stainless steel, sealed granite, sealed fiberglass, plastic laminate and		
	glass-top stoves[*] [*]at room temperature]. [[Soft Scrub® with Bleach] [This product] removes soap		
	scum, limescale, calcium, toilet rings, dirt and grime.]		
1	,,,		

Optional Claims for Front or Back Panel

- 35. Hospital Disinfectant [Cream] [Cleaner] [Cleanser] on hard, non-porous surfaces
- 36. Industrial Disinfectant [Cream] [Cleaner] [Cleanser] on hard, non-porous surfaces
- 37. Institutional Disinfectant [Cream] [Cleaner] [Cleanser] on hard, non-porous surfaces
- 38. Healthcare Disinfectant [Cream] [Cleaner] [Cleanser] on hard, non-porous surfaces
- 39. Kills \*\* Rhinovirus (Type 39) [in 3 Minutes] [at full strength]
- 40. Kills \*\*Influenza A Virus [in 3 Minutes] [at full strength]
- 41. Great for everyday [cleaning] [deodorizing] and [disinfecting]
- 42. Disinfects hard, nonporous surfaces against **\*\***SARS-CoV-2<sup>+</sup> [[the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]
- 43. Disinfects/Effective against [the] \*\*SARS-CoV-2†/ \*\*COVID-19 Virus† / [the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]
- 44. Kills/Destroys/ [the] \*\*SARS-CoV-2† / \*\*COVID-19 Virus† /
- 45. Eliminates 99.9% [of] [the] \*\*SARS-CoV-2+ / \*\*COVID-19 Virus+ /
- 46. Helps reduce the spread of [the] \*\*SARS-CoV-2† / \*\*COVID-19 Virus† / [[the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]]
- 47. [Now] tested [and proven [effective]] against [the] \*\*SARS-CoV-2† / \*\*COVID-19 Virus† / [[the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]]
- 48. [Now] tested [and proven [effective]] to kill [the] \*\*SARS-CoV-2† / \*\*COVID-19 Virus† / [[the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]]
- 49. [Now] tested [and proven [effective]] to help reduce the spread of [the] \*\*SARS-CoV-2† / \*\*COVID-19 Virus† / [[the cause of] [the coronavirus that causes] COVID-19] [in 3 min[utes]]

<u>The \*\* qualifier will only appear before a virus name when the words Virucide\*\* or Virucidal\*\* are</u> used on the label)

\*\*\* When used according to directions for disinfection.

† Kills \*\*SARS-CoV-2 on hard, nonporous surfaces [in 3 min[utes]]

**Optional Claims for Front or Back Panel** 

Disinfectancy-related bullets/bursts/sentences:

2.—[[This product] [-OR- ACCEPTED ABN] has demonstrated effectiveness against <u>\*\*</u>iInfluenza A virus and is expected to inactivate all influenza A viruses

3.2. [[This product] [-OR- ACCEPTED ABN] has demonstrated effectiveness against \*\*SARS-CoV-2<sup>+</sup> [the coronavirus that causes COVID-19]

# Optional Claims for Front or Back Panel

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

- 1. [Cleans] [Fights] [Removes]
- [tough] stains 2. Commercial
- 3. Custodian/Custodial
- 4. Deodorizes
- 5. [Gently] Bleaches out tough stains
- [Has] [With] [a] [the] [clean] [pleasant] [fresh] [Mountain Breeze] [Original] [Fresh] [scent] [fragrance]
- 7. [Mountain Breeze] [Original] [Fresh] [scent] [fragrance
- 8. Industrial
- 9. Institutional
- 10. Stain Fighting
- 11. The power of bleach with a [great] [clean] [fresh] scent
- 12. Tough on [stains] [grease] [soap scum]
- 13. Tough on greasy dirt, [and] mildew stains [and] soap scum
- 14. [Wow] Stay-Clean Cap
- 15. The Power of Soft Scrub with [a] [Clean] [Fresh] [Mountain Breeze] [the] [Original] [Fresh] Scent
- 16. Multi-surface [cream] [cleaner] [cleanser]
- 17. Tough cleaning [action] [power]
- Thick formula sticks to stains
- 19. [Great] [Good] for heavy duty cleaning
- 20. Grease Cutting
- Brightens as it cleans [chose one or more options from surface list A]
- 22. Stain-fighting [power] [action]

- 23. [Wow] Easy Squeeze 24. [Wow] Clean Squeeze
- 25. Bleach Power [Cream]
- [Cleanser] [Cleaner]
- 26. Cream [Cream Cleanser]
- 27. Bleach Prominence
- 28. Good for [whitening] [brightening] surfaces
- 29. Gentle on Surfaces<sup>1 1</sup>See Directions (ATTENTION)
- 30. Value Size
- 31. Bonus Size
- 32. The Ultimate Clean [!]
- 33. A Clean You Can Trust [!]
- 34. A Clean You Can See and
- Feel [!]
- 35. Great Value
- 36. The Power of Bleach, The Clean of Soft Scrub
- 37. A Product [of] [in] [the] [Dial] [Henkel] Professional [Products] Series
- Henkel Consumer Goods Inc.
- 39. [Dial] [Henkel] [Commercial] [Professional] [Products] [Series]
- 40. [Improved] Stain Fighting
- 41. Tough stain fighter
- 42. For Bath and Kitchen
- 43. Instant Cleaning Action
- 44. Deodorizes/Deodorizer
- 45. [Complete] [Total] Clean
- 46. [Easy] [Easy to Use]
- 47. Effective [Clean]
- 48. Express [Clean]
- 49. Extreme [Clean]
- 50. Fast [Clean]
- 51. [Quick][Quick & Easy]
- 52. Ready to Use
- 53. Versatile
- 54. [Clean] [Cleaning]
- 55. [Degreaser][Degreases]

- 56. Beautiful [Clean] 57. [Bright][Brilliant][Shine]
- 58. [Express] Clean & Fresh
- 59. [Brightens] and/or
- [Whitens] in seconds (as it cleans)
- 60. Cleans with the power of bleach
- 61. Contains (fast-acting) grease cutters
- 62. Deep down clean!
- 63. Extreme white clean
- 64. Fast acting brightener
- 65. [Great] [whitening] [power] [action]
- 66. Immediate whitening action
- 67. Multi-purpose cleaner with Bleach for [Kitchens] & [Bathrooms][Restrooms] [Baths]
- 68. Starts to whiten [instantly][on contact]
- 69. Whitens and removes mold (stains) [greasy dirt]
- 70. Cleans greasy dirt better than ordinary bleach alone
- 71. Whitening stain remover
- 72. Whitens and removes mold (stains) and mildew stains
- 73. Whitens as it cleans
- 74. Whitens cutting surfaces
- 75. Whitens sealed grout in bathtubs, showers, floors and walls
- 76. Cleans [&] [and] Whitens from the [1st][first] wipe
- 77. Cleans [&] [and] Brightens from the [1st][first] wipe
- 78. Cleans from the [1st][first] wipe
- 79. Whitens from the [1st][first] wipe
- 80. Brightens from the [1st][first] wipe

[Toilet] Rust

**Kitchen Stains** 

[Bathroom] [Kitchen]

Everyday messes

Tough grease

Limescale

Calcium

[Food] Soil[s]

Grout

19.

20.

21.

22.

23.

24.

25.

26.

- [Removes] [Cleans [Away]]...
  - 1. [Bathroom] soils
  - 2. [Food] [coffee] [tea]
  - [mildew] [and] [juice] stains 3. [General household] dirt
  - [General household] of
    [Hard] water deposits
  - 5. [Tough] [Greasy] dirt
  - 6. Tough [stains] [soil[s]]
  - 7. Bathroom dirt
  - 8. Bathroom stains

- 9. Bathtub ring[s]10. Fingerprints
- 11. [Smudges]
- 12. Grime
- 13. Mineral deposits

Mold and Mildew Stains

[Tough] Grease [and

- 14. Pot marks
- 15. Soap scum16. Toilet ring[s]

Grime]

17.

18.



#### **PROMOTIONAL CLAIMS**

- 1. Twin Pack
- 2. 2-Pack
- 3. 3-Pack
- 4. Bonus Pack
- 5. Value Pack
- 6. 50% More vs. 24oz bottle Note: this would apply only to the 36oz bottle
- 7. Limited Edition Pack
- 8. Instant Savings
- 9. \$avings

#### **Optional non Graphics**

#### Front or Back Label

#### List A – Surface Options:

#### Hard, Nonporous Surfaces for Disinfecting and Cleaning:

- 1. [Bath] Tub[s] [Imitation] [Sealed Cultured] [Synthetic] marble
- 2. Inside [and] [Outside] [of] Dishwashers
- 3. Outside of Microwaves
- Outside of Refrigerators
- 5. Bathroom [sink][s] [countertop[s]] [counter[s]] [glazed tile] [floors] [fixtures] [appliances]
- Garbage Can[s] 6.
- 7. Trash Can[s]
- 8. Waste Receptacle[s]

Healthcare

Institutions

Industrial

facilities

Nursing homes

- Sealed Fiberglass [boat 9. [deck[s]] [hull[s]] [exterior] [gunwale] [bow]]
- 10. Glass [Shower] [Doors] 11. Plastic Laminate
- [Formica]
- 12. Glazed [Ceramic] tile[s]
- 13. Glazed Porcelain
- 14. Hard surface floors 15. Kitchen [sink[s]] [countertop[s]] [counter[s]] [glazed tile[s]] [floors] [fixtures] [appliances]
- 16. Locker rooms
- 17. Non-food contact
- 18. Nonporous [Hard] [Solid] [Engineered] Surfaces
- 19. Outdoor Furniture
- 20. Oven doors
- 21. Sealed Granite

- 22. Shower[s] [stalls] [walls]
- 23. Stainless Steel
- 24. [Stove Top[s]] [Stovetop[s]][<sup>±</sup>] [<sup>±</sup>]at room temperature
- 25. Tabletop[s]
- 26. Toilet[s]
- 27. Glass-top Stove[s][<sup>±</sup>] [<sup>±</sup>]at room temperature
- 28. Vinvl
- 29. Quartz [counter top[s]] [surfaces]
- 30. Sink[s]
- 31. Garbage Disposal[s]
- 32. Drain[s]
- 33. Glass cooktop[s]
- 34. Restroom
- 35. Family Room
- 36. Nursery
- 37. Bedroom
- 38. Garage
- 39. Laundry Room
- 40. Play Room
- 41. Den/Study
- 42. Storage Area

## Locations for Disinfecting and Cleaning:

[For use in[:]] 1. Hospitals\*\*\*\*

2.

3.

4.

5.

- 6. Manufacturing
  - [facilities][plants][Manufactur ers]
  - [Hotels] [Motels] 7.
  - Correctional institutes 8.

- 12. Office buildings
- 13. Day care [centers][facilities]
- 14. [Schools][Colleges][Universities]
- 15. Sports facilities
- 16. Health clubs
- 17. [Dental] [Physician's] [Doctor's] Office
- 18. ^[Cafeteria][Restaurant] <sup>^</sup>This product is not approved for use on food-contact surfaces

\*\*\*\* 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.

- - 9. Detention
  - [Centers][Facilities]
  - 10. Prisons
  - 11. Public transportation

## **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 emerging pathogen claims from the following viral categories:

- Enveloped viruses
- Large non-Enveloped viruses

For an emerging viral pathogen that is a/an	follow the directions for use for the following organisms on the label
Enveloped virus	Rhinovirus Type 39
Large, non-enveloped virus	Rhinovirus Type 39

[Product name] has demonstrated effectiveness against viruses similar to [name of emerging virus] on hard, non-porous surfaces. Therefore, [product name] can be used against [name of emerging virus] when used in accordance with the directions for use against Rhinovirus Type 39 on hard, non- porous surfaces. Refer to the [CDC or OIE] website at [pathogen-specific website address] for additional information.

[Name of illness/outbreak] is caused by [name of emerging virus]. [Product name] kills similar viruses and therefore can be used against [name of emerging virus] when used in accordance with the directions for use against Rhinovirus Type 39 on hard, non-porous surfaces. Refer to the [CDC or OIE] website at [website address] for additional information.