

64240-64

12/30/2009

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs  
Antimicrobials Division (7510C)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

Reg. No. 64240-64

Date of Issuance: DEC 30 2009

Term of Issuance: Unconditional

Name of Pesticide Product: BIG 2

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Combat Insect Control Systems  
c/o Henkel Consumer Goods Inc.  
19001 N. Scottsdale Road  
Scottsdale, AZ 85255

Note: Changes in labeling, differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision Number: D-409905 unconditionally registered in accordance with FIFRA sec 3(c)(7)(a) provided that you:

1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
2. Make the labeling changes listed below before you release the product for shipment:
  - a. Revise the EPA Registration Number to read, "EPA Reg. No. 64240-64".

Signature of Approving Official:

*Jacqueline McFarlane*  
Jacqueline McFarlane  
(Acting) Product Manager Team 34

Date:

DEC 30 2009

Regulatory Management Branch II

CONCURRENCES

SYMBOL	Antimicrobials Division (7510P)					
SURNAME	Form 8570-6					
DATE						

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

b.) Revise the last statement under "To disinfect toilet bowls" on page 2 by deleting the phrase "to kill gram-negative bacteria." The data supports disinfection of hard surfaces against gram negative and positive bacteria after ten minutes.

c.) Since this product is not approved as a food contact sanitizer, you must add the following statements to the "To disinfect/clean hard, nonporous surfaces" directions:

*Rinse all surfaces that come into contact with food such as countertops, appliances, tables, and stovetops with potable water before reuse. Do not use on utensils, glassware, or dishes.*

d.) Bold the heading, Precautionary Statements.

e.) Revise the "Storage/Disposal" instructions on page 3 for uses other than household/residential by adding the statement, "Do not contaminate water, food, or feed by storage and disposal." It must appear immediately after the "Storage and Disposal" heading.

f.) Implied claims of heightened efficacy of a product by itself or compared with another product are false and misleading according to PR Notice 93-6. Therefore, delete the 8<sup>th</sup> bullet, Professional Strength, in the first column on page 6 because it is considered heightened efficacy.

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

A stamped label with conditions is enclosed for your records. Submit one (1) copy of your final printed labeling prior to release of this product for shipment. Should you have any questions concerning this letter, please contact me by telephone at (703) 308-6416 during the hours of 8:00 am to 4:00 pm EST.

Sincerely,

Jacqueline McFarlane  
(Acting) Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosures: (Stamped Label)

		CONCURRENCES				
SYMBOL	Efficacy Rebuttal Response					
SURNAME	Chemistry Data Evaluation					
DATE						

Note: *Bold, italicized text is information for the reviewer and is not part of the label.*

MASTER LABEL - 12/17/09  
Big 2  
EPA Reg. No. 64240-64

[Bracketed information indicates optional or alternative text.]

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# BIG 2

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

DEC 30 2009

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 64240-64

**Claim for Front or Back Panel: Kills 99.9% of Germs\***

ACTIVE INGREDIENT: CITRIC ACID...13.7%  
OTHER INGREDIENTS:.....86.3%

**KEEP OUT OF REACH OF CHILDREN**

**DANGER: CORROSIVE.** Causes irreversible eye damage.  
Read back panel carefully.

Net Contents: \_\_\_\_\_

\* Salmonella enterica (Salmonella) -and/or- Pseudomonas aeruginosa (Pseudomonas) -and/or- Staphylococcus aureus (Staph) -and/or- Rotavirus in 10 minutes at full strength

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MASTER LABEL – 12/17/09

Big 2

EPA Reg. No. 64240-64

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Graphics below are representative of, but not necessarily the exact depictions of figures for the final label.

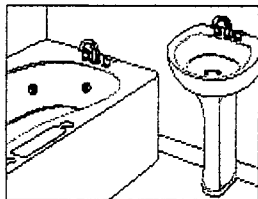
[Use]

**Big 2**

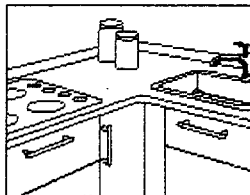
[For]

[To Clean]

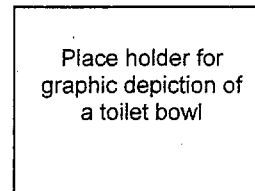
[To Remove]



[Soap Scum & Stains]



[Calcium &] [Lime] [Limescale]



Place holder for graphic depiction of a toilet bowl

[Toilet Ring]

**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with its labeling.

**UsageAreas:** Use around [your] [the] house to clean [even] tough stains and build up. Gentle on most hard, nonporous surfaces. Works great on sinks, bathtubs, shower tiles and doors, toilet bowls, glass, chrome, faucets and fixtures. For other surfaces, spot test in an inconspicuous area. Not recommended for use on natural stone, aluminum, colored grout, copper and brass. Avoid contact with wood, fabric, vinyl, painted surfaces and wallpaper. Avoid prolonged contact on grout – wet grout with water before use. Use only in ventilated areas.

**To clean [and deodorize]:**

[1] Rotate nozzle to ON [position]

[2] Spray 6-8 inches from surface

[3] Wipe thoroughly with a wet sponge or cloth then rinse with water

[4] For heavily soiled areas, let product stand 1-2 minutes then wipe and rinse with water

**To disinfect toilet bowl:** Heavily soiled surfaces must be pre-cleaned prior to disinfecting. Flush and drain toilet bowl. Apply three sprays or until thoroughly wet to sides of bowl from a distance of 6-8 inches and let stand 10 minutes before flushing to kill gram-negative bacteria.

**To disinfect and clean [other] hard, nonporous surfaces:** Heavily soiled surfaces must be pre-cleaned prior to disinfecting. Apply at full strength by spraying until thoroughly wet and leave on for 10 minutes, then wipe and rinse with water.

**To sanitize pre-cleaned hard, nonporous surfaces:** Pre-clean surfaces prior to sanitizing. Apply at full strength by spraying until thoroughly wet and leave on for 30 seconds, then wipe and rinse with water.

**PRECAUTIONARY STATEMENTS:**

**Hazards to Humans and Domestic Animals**

**DANGER: Corrosive.** Causes irreversible eye damage. Do not get in eyes, on skin, or on clothing. Wear safety glasses, goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or restroom. 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, then continue rinsing. Call a poison control center or doctor for treatment advice. **Note to Physician:** Probably mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when calling a Poison Control Center or doctor for treatment advice.

Follow the manufacturer's instructions for cleaning/maintaining PPE. If not such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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Big 2  
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**Physical or Chemical Hazards:** Contains citric acid. Do not mix with chlorine bleach or other household chemicals, as hazardous gases may be released.

*Note to Reviewer: Household/Residential Storage Disposal Statements*

**Storage & Disposal**

Store in cool place well-ventilated area inaccessible to small children and pets. Do not contaminate water, food, or feed by storage and disposal. Non-refillable container. Do not re-use or refill this container. Offer for recycling if available or discard in trash.

*Note to Reviewer: All uses other than Household/Residential Storage Disposal Statements*

**Storage & Disposal**

**Pesticide Storage:** Store in a cool, well-ventilated area inaccessible to small children and pets.

**Pesticide Disposal:** Pesticide wastes may be 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

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

**Information for Front or Back Panel**

EPA Reg. No. 64240-\_\_\_\_\_  
EPA Est. No. \_\_\_\_\_

Place Holder for UPC Bar Code

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](http://www.softscrub.com)

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-or-

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MASTER LABEL - 12/17/09

Big 2

EPA Reg. No. 64240-64

[Bracketed information indicates optional or alternative text.]

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**Quality & Responsibility** **Henkel**

Worldwide, for more than 130 years, our brands have combined quality with respect for people and the environment. This is what Henkel stands for - today and tomorrow.

-or-

**Quality & Responsibility** **Henkel**

**ACCEPTED**  
**with COMMENTS**  
**in EPA Letter Dated:**  
**DEC 30 2009**

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MASTER LABEL - 12/17/09  
Big 2  
EPA Reg. No. 64240-64

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***Claims for Front or Back Panel***

***Disinfectancy-related claims, bullets/bursts/sentences:***

- Antibacterial cleanser
- Antibacterial
- Antibacterial Action
- Kills Bacteria **-or-** Germs
- Kills odor-causing Bacteria **-or-** Germs
- Disinfectant Disinfecting
- Kills germs while it cleans
- Disinfects & Deodorizes
- Disinfects
- Disinfects As It Cleans
- Disinfects and Deodorizes by Killing Germs and Their Odors
- Multi-Purpose Disinfectant
- Multi-Room **-or-** All Purpose **-or-** Multi-Surface Cleanser
- Kills Microorganisms: Salmonella enterica (Salmonella) and Pseudomonas aeruginosa (Pseudomonas) and Staphylococcus aureus (Staph) in 10 minutes at full strength
- Kills 99.9% of [household] germs: Salmonella enterica (Salmonella) -and- Pseudomonas aeruginosa (Pseudomonas) -and- Staphylococcus aureus (Staph) -and- Rotavirus in 10 minutes at full strength
- Disinfectant Cleanser
- Disinfecting Cleanser
- Home Disinfectant [Cleanser]
- One Step Disinfectant
- Leaves Surfaces Sanitary
- Sanitizer
- Sanitizes non-porous surfaces
- Sanitizes hard, non-porous surfaces
- Eliminates **-or-** Wipes out odors caused by bacteria **-or-** germs **-or-** microorganisms
- Bactericide **-or-** Bactericidal
- Germicide **-or-** Germicidal
- Hospital disinfectant cleaner [cleanser]
- Industrial disinfectant cleaner [cleanser]
- Institutional disinfectant cleaner [cleanser]
- Healthcare disinfectant cleaner [cleanser]
- One step disinfectant. Kills germs while it cleans! Kills common [household] germs **-or-** Salmonella enterica (Salmonella) -and/or- Pseudomonas aeruginosa (Pseudomonas) -and/or- Staphylococcus aureus (Staph) -and- Enterococcus faecalis VRE -and- Shigella sonnei -and- Escherichia coli -and- Staphylococcus aureus (MRSA) -and- Rhinovirus Type 39 -and- Influenza A2 -and- Norovirus -and- Rotavirus in 10 minutes at full strength
- Sanitizes pre-cleaned surfaces in 30 seconds. Kills common [household] germs -or- Klebsiella pneumoniae -and- Staphylococcus aureus (Staph) -and- Enterococcus faecalis VRE -and- Shigella sonnei -and- Escherichia coli -and- Staphylococcus aureus (MRSA) -and- Rhinovirus Type 39 -and- Influenza A2 -and- Rotavirus in 30 seconds at full strength.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

DEC 8 0 2009

Under the Federal Insecticide,  
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**Front or Back Panel**

**Non-disinfectancy related claims, bullets/bursts/sentences:**

- Cleans ~~-or-~~ fights ~~-or-~~ removes [tough] stains
- Commercial
- Custodian/Custodial
- Deodorizes
- Food Service
- Industrial
- Institutional
- Professional Strength
- Multi-surface cleaner
- Tough cleaning [action] [power]
- [Great] [Good] for heavy duty cleaning
- Grease Cutting
- Brightens as it cleans
- Has a [clean] [pleasant] [fresh] scent -or- fragrance
- Tough on [stains] [grease] [soap scum]
- Tough on greasy dirt, -and/or- soap scum
- Gentle on most surfaces\* See Directions
- The Ultimate Clean
- A Clean You Can Trust
- A Clean You Can See and Feel
- ~~[Dial] Professional Series~~
- Henkel Consumer Goods Inc.
- Henkel [Commercial] [Professional] [Products] [Series]

**Removes or Cleans:**

- [Bathroom] soils
- [General household] dirt
- [Hard] water deposits
- [Tough] [greasy] dirt
- [Tough] soils
- Bathroom dirt
- Bathtub rings
- Fingerprints or smudges
- Grime
- Mineral deposits
- Pot marks
- Soap scum
- [Tough] Grease [and Grime]
- Toilet ring
- [Toilet] Rust
- Limescale
- Calcium
- [Bathroom] [Kitchen] [Food] Soils

**Cleans:**

- Garbage Cans
- Trash Can[s]
- Waste Receptacles

**Other:**

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DEC 6 0 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 64240-64



**Seal of Approval**

*(Place holder until qualified by GH after EPA registration)*



*(Place holder until qualified by NSF after EPA registration)*



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MASTER LABEL - 9/25/09  
Big 2  
EPA Reg. No. 64240-AU

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**Front or Back Label**

**Surfaces for Disinfecting and Cleaning:**

- [Bath] tub [Imitation] [Cultured] [Synthetic] marble
- [Inside -and/or- Outside of] Dishwashers
- [Inside -and/or- Outside of] Microwaves
- [Inside -and/or- Outside of] Refrigerators
- Bathroom [sink] [countertop] [counter] [glazed tile] [floors] [fixtures] [appliances]
- Sealed Fiberglass
- Glass [shower doors]
- Plastic Laminate [Formica]
- Glazed [ceramic] tile
- Glazed Porcelain
- Hard surface floors
- Kitchen [sink] [countertop] [counter] [glazed tile] [floors] [fixtures] [appliances]
- Locker rooms
- Non-food contact
- Nonporous [Hard] [Solid] Surfaces
- Outdoor Furniture (except cushions and woodframes)
- Oven doors
- Sealed Granite
- Shower [stalls]
- Stainless Steel
- Stove Tops
- Tabletops
- Toilets

**Locations for Disinfecting, Sanitizing and Cleaning:**

- Hospitals
- Animal hospitals
- Correctional institutes
- Day care facilities
- Healthcare
- Health clubs
- Hospitals
- Hotels
- Industrial facilities
- Institutions
- Manufacturing facilities/plans/Manufacturers
- Motels
- Nursing homes
- Office buildings
- Prisons
- Public transportation
- Schools/Colleges/Universities
- Sports facilities
- Veterinary clinics
- Veterinary hospitals

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