

64240-65

10/26/2010

1 of 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OCT 26 2010

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Georgia Anastasiou
Lewis & Harrison
122 C Street, N.W. Suite 740
Washington, D.C. 20001

Subject: **WC Complete**
EPA Registration No. 64240-65
Application Date: July 26, 2010
Receipt Date: July 29, 2010

Dear Ms. Anastasiou:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 3 (c) 7 A as amended, is accepted with conditions.

Proposed Amendment:

- Revised label per Agency comments from 3/9/10 letter

Conditions

Revise the label to read

1. On page 6 of your label you have indicated an unqualified germ. Thus all instances where germs are listed on the label, include an asterisk (*). These germ claims occur on page 6.

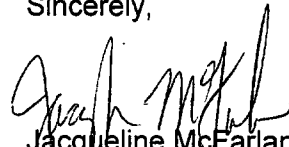
General Comments

A stamped label with conditions is enclosed. Submit a copy of your final printed label before distributing or selling the product.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby.stacey@epa.gov during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

40910

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Highlighted text is new.

[Bracketed information is optional or alternative text.]

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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 and before eating, drinking, chewing gum, using tobacco or using the toilet. ~~Avoid breathing spray mist.~~

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.

~~**If on skin:** Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.~~

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information [on WC Complete] call [SafetyCall International at] 1-866-338-8517[, 24h/day, seven days a week].

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

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

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



-or-



-or-



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

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

[Use]

WC COMPLETE [OR ABN ON PAGE 1]

[For]

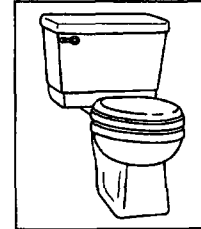
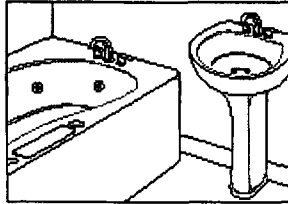
[To Clean]

[To Remove]

[Soap Scum] [&] [Stains]

[Calcium] [&] [Lime] [Limescale]

[Toilet Ring]



Usage Areas: Use around [your] [the] house to clean [even] tough stains and build up. Use on hard, nonporous surfaces [such as plastic laminate, sealed granite, cultured marble, stainless steel, glass, chrome, and glazed porcelain]. Works great on sinks, bathtubs, shower doors, glazed tile, toilet bowls, faucets and fixtures. For other surfaces, spot test in an inconspicuous area. Not recommended for use on natural stone, copper and brass. Avoid contact with wood, fabric, vinyl, painted surfaces and wallpaper.

To clean and deodorize:

[1] Choose SPRAY or FOAM

- For lighter spot cleaning or larger surface areas
Spray: Open screen and rotate to "SPRAY" [*graphic depiction of the nozzle in SPRAY position*]
- For heavier cleaning or more focused surface areas
Foam: Close screen and rotate to FOAM [*graphic depiction of the nozzle in FOAM position*]

[2] Spray [or apply foam] 6-8 inches from surface.

[3] Wipe thoroughly with a clean, damp cloth or sponge.

[4] For heavily soiled areas, let product stand several minutes then wipe and rinse with water (if needed).

[5] [To get at hard to reach areas like under the toilet rim, invert bottle for optimal cleaning.]

[5]-~~or~~-[6] Rotate nozzle to STOP position after use.

To clean and disinfect hard non-porous surfaces [~~in one step~~]: Apply product [by spray or foam] and leave on surface for 10 minutes before wiping clean. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To sanitize hard non-porous surfaces: Apply product [by spray or foam] and leave on surface for 30 seconds before wiping clean. Pre-clean surfaces prior to sanitizing.

To clean inside toilet bowl: Set to FOAM and invert bottle to spray sides and under rim of toilet bowl. Let stand for several minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

To disinfect inside toilet bowl: Empty water from toilet. Set to FOAM and invert bottle to spray sides and under rim of toilet bowl. Let stand for 10 minutes, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

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Note to Reviewer: Household/Residential Storage Disposal Statements

Storage & Disposal

Store in cool place 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: All uses other than Household/Residential Storage Disposal Statements

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.

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Claims for Front or Back Panel

Disinfecting, Sanitizing and Cleaning Claims:

1. Antibacterial Cleanser
2. Antibacterial
3. Antibacterial Action
4. Kills Bacteria [~~Germs~~]
5. Kills Odor-Causing Bacteria [~~Germs~~]
6. Kills Toilet Germs
7. Disinfectant [Disinfecting]
- ~~8. Kills Germs While It Cleans~~
9. Disinfects & Deodorizes
10. Disinfects
- ~~11. Disinfects As It Cleans~~
12. Disinfects and Deodorizes by Killing Germs and Their Odors
13. Bathroom Disinfectant
14. Multi-Purpose Disinfectant
15. Multi-Room [~~All Purpose~~] [Multi Purpose] [Multi-Surface] Cleanser
- ~~16. Kills Microorganisms~~
17. Kills Salmonella enterica [ATCC 10708] (Salmonella) in 10 minutes at full strength
18. Kills Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) in 10 minutes at full strength
19. Kills Staphylococcus aureus [ATCC 6538] (Staph) in 10 minutes at full strength
- ~~20. Kills 99.9% of [household] germs~~
21. Kills 99.9% of Salmonella enterica [ATCC 10708] (Salmonella) in 10 minutes at full strength
22. Kills 99.9% of Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) in 10 minutes at full strength
23. Kills 99.9% of Staphylococcus aureus [ATCC 6538] (Staph) in 10 minutes at full strength
24. Kills Influenza A [Virus] In 30 Seconds
- ~~25. Kills H1N1 [Virus] In 30 Seconds~~
26. Kills Rotavirus In 30 Seconds
27. Kills Rhinovirus [Type 39] In 30 Seconds
28. Disinfectant Cleanser
29. Disinfecting Cleanser
30. Home Disinfectant [Cleanser]
- ~~31. One Step Cleanser And Disinfectant~~
- ~~32. Cleans And Disinfects In One Step~~
33. Disinfects All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
34. Sanitizes All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
35. Cleans And Disinfects All Bathroom Hard Non-Porous Surfaces [Even Inside Toilets]
36. Leaves Surfaces Sanitary
37. Sanitizer
38. Sanitizes Non-Porous Surfaces
39. Sanitizes Hard, Non-Porous Surfaces
40. Eliminates [Wipes Out] Odors Caused By [Bacteria] [~~Germs~~] [~~Microorganisms~~]
41. Bactericide [Bactericidal]

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Claims for Front or Back Panel

Disinfectant and Sanitizer claims, bullets/bursts/sentences:

1. Germicide [Germicidal]
2. Virucide [Virucidal]
3. Removes Mold and Mildew
4. Inhibits [Growth of] Mold and Mildew
5. Hospital Disinfectant Cleaner [Cleanser]
6. Industrial Disinfectant Cleaner [Cleanser]
7. Institutional Disinfectant Cleaner [Cleanser]
8. Healthcare Disinfectant Cleaner [Cleanser]
- ~~9. One Step Disinfectant. Kills Germs While It Cleans. [!] Kills Common [Household] Germs In 10 Minutes at full strength~~
10. Sanitizes surfaces in 30 seconds. Kills 99.9% of common [household] germs*
* Kills Salmonella enterica and Staphylococcus aureus in 10 minutes at full strength and [Influenza A] [Rotavirus] [Rhinovirus [Type 39]] Virus In 30 Seconds
11. Sanitizes surfaces in 30 seconds. Kills 99.9% of Staphylococcus aureus [ATCC 6538] (Staph) in 30 seconds at full strength
12. Sanitizes surfaces in 30 seconds. Kills 99.9% of Enterobacter aerogenes [ATCC 13048] in 30 seconds at full strength
13. Sanitizes surfaces in 30 seconds. Kills 99.9% of Shigella sonnei [ATCC 25931] in 30 seconds at full strength
14. Sanitizes surfaces in 30 seconds. Kills 99.9% of Escherichia coli [ATCC 11229] in 30 seconds at full strength
15. [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).]
16. [[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.]
17. [[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).]
18. [Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).]
19. [Kills Pandemic 2009 H1N1 influenza A virus.]
20. Kills Bacteria [Germs*]
* Kills Salmonella enterica and Staphylococcus aureus in 10 minutes at full strength and [Influenza A] [Rotavirus] [Rhinovirus [Type 39]] Virus In 30 Seconds

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Front or Back Panel

Non-disinfectant/sanitizer claims, bullets/bursts/sentences:

- Cleans [& Deodorizes] Your Entire Bathroom – Even [Inside] [The] Toilet[s]
- [Cleans] [Fights] [Removes] [Tough] Stains
- Tough [Great] [On] [For] [Stains] [Calcium] [Lime Scale] [Hard Water] [Soap Scum] [Rust] [Soils] [Greasy Dirt] [Outdoor Soils]
- Commercial
- Custodian/Custodial
- Industrial
- Institutional
- Residential
- Food Service
- [Henkel Consumer Goods Inc.] [Henkel] [Commercial] [Products] [Series]
- Multi-Surface Cleaner
- Tough Cleaning [Action] [Power]
- [Great] [Good] For Heavy Duty Cleaning
- Your Complete Bathroom [Caddy] [Arsenal] [In One Product]
- [Trigger] [Even] [Sprays] [Works] [Upside Down] [Sideways] *[May include an illustration or graphic depiction of the container shown upside down.]*
- Sprays A Thick Foam And A Fine Mist
- Powerful Foaming Action
- Sprays 360 Degrees
- Thick Foam Clings To [Toilet Bowl] [Sides Of Toilet] [Shower Walls] [Tubs]
- Strong Enough For Your Toilet
- One Product, Multiple Uses
- Tough On Stains
- Has A [Clean] [Pleasant] [Fresh] [Scent] [Fragrance]
- Easy To Use Trigger
- The Ultimate Clean
- A Clean You Can Trust
- A Clean You Can See And Feel
- Deodorizes
- Makes Cleaning The Bathroom Easier
- Saves Time When Cleaning
- Cleans Your Bathroom Inside And Out
- Cleans To The Nth Degree
- Totally Rethink Clean
- Fresh Scent

Removes or Cleans:

- Bathroom [Soils] [Dirt]
- General Household Dirt
- Outdoor Soils
- [Tough] [Greasy] Dirt
- [Tough] Soils
- [Tough] Grease [And Grime]
- Bathroom Rings
- Fingerprints Or Smudges
- Grime
- Soap Scum
- Toilet Ring
- [Toilet] Rust
- Limescale
- Mineral Deposits
- [Hard] Water Deposits
- Calcium

- Cleans Garbage Can[s]
- Cleans Trash Can[s]
- Cleans Waste Receptacle[s]

Other:

Good Housekeeping Seal of Approval



(to be used only upon consent of this third party)

“NSF Listed”



(to be used only upon consent of this third party)

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Front or Back Panel

Surfaces for Disinfecting, Sanitizing and Cleaning:

- [Bath] Tub
- [Imitation] [Cultured] [Synthetic] Marble
- Bathroom [Sink] [Countertop] [Counter] [Tile] [Floors] [Fixtures] [Appliances]
- Sealed Fiberglass [Doors] [Shelves] [Surfaces]
- Glass [Shower Doors]
- Plastic Laminate [Formica®]
- Glazed [Ceramic] Tile
- Glazed Porcelain [Tile]
- Hard Surface [Glazed Tile] Floors
- Non-Food Contact
- Nonporous [Hard] [Solid] Surfaces
- Toilets (Inside And Outside)
- Shower [Stalls]
- Doorknobs
- Stainless Steel
- Sealed Granite

Locations for Disinfecting, Sanitizing and Cleaning:

- ~~Animal [Veterinary] Hospitals~~
- ~~Veterinary Clinics~~
- Medical [Clinics] [Facilities]
- Hospitals
- Healthcare [Facilities]
- Nursing Homes
- Health Clubs
- Industrial Facilities
- Institutions
- Manufacturing [Facilities] [Plants]
- Hotels [Motels]
- Office Buildings
- Prisons
- Correctional [Facilities] [Institutes]
- Public Transportation
- Day Care Facilities
- Schools
- Colleges
- Universities
- Sports Facilities