

64240-69

07-21-2011

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U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Antimicrobials Division (7510P)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number:
64240-69

Date of Issuance:
JUL 21 2011

Term of Issuance:
Conditional

Name of Pesticide Product:
Pharaoh

NOTICE OF PESTICIDE:

Registration
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Combat Insect Control Systems
c/o Henkle 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/reregistered 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 No. D-445947) is 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 File Symbol to read, EPA Reg. No. 64240-69"

Signature of Approving Official:

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

Date:

JUL 21 2011

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b. Revise the "Hazards to Humans and Domestic Animals" statement as follows:

WARNING: Causes substantial but temporary eye injury. Cause skin irritation. Harmful if absorbed through skin. Do not get in eyes, on skin or clothing. Wear coveralls over short-sleeved shirt and short pants, socks, chemical-resistant footwear, and natural rubber gloves when handling this product. Wear goggles, face shield, or shielded glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the restroom. Remove and wash contaminated clothing before reuse.

c. Separate "Have the product container or label..." statement from the "IF SWALLOWED" route of exposure under the First Aid statement.

d. The proposed label claims that the product, Pharaoh, is an effective mildewstat for a 3-minute contact time. This claim is acceptable as it is supported by the submitted data; however, the following revisions must be made to the proposed label:

- On page 3 of the proposed label, change "To remove [and inhibit the growth of] mold and mildew" to read "To remove [and inhibit the growth of] mold and mildew on hard, nonporous surfaces."
- Under the mildewstat directions for use on page 3 of the proposed label, include the following (or a similar) statement: "For heavy soil, pre-clean surface before applying product."

e. There is no medical device use claim on the proposed label. As the product is labeled as a hospital disinfectant, a statement conforming to PR Notice 94-4 should be included.

f. Make the following revisions to the proposed label:

- On page 3 of the proposed label, under the pesticide storage section add instructions that specify what to do if the product leaks or spills from the container.
- On page 3 of the proposed label, identify recommended methods for applying the product (e.g., "by sponge, mop, or spray" or "by immersion in the solution").
- On page 3 of the proposed label, change "tile" to read "glazed tile." Tile is a porous surface.
- On page 3 of the proposed label, change "fiberglass" to read "sealed fiberglass." Fiberglass is a porous surface.
- On page 3 of the proposed label, change "cultured marble" to read "sealed cultured marble."
- On page 3 of the proposed label, change "natural stone" to read "sealed natural stone."
- On page 4 of the proposed label, change the claim "Leaves Surfaces Sanitary" to read "Leaves Surfaces Sanitized or Disinfected" as the Agency does not have a standard for sanitary.

- ATCC designation numbers are required in one of the following locations:
On the data matrix, on the master label (as optional text) with the listing of the organisms claimed or as the final page of the master label (as optional text).
- On page 4 of the proposed label remove the unqualified "Germs" claims.
- On page 4 of the proposed label remove "Healthcare Disinfectant" statements or claims that suggest or imply that the product can or will prevent or control disease or offer health protection, are unacceptable.
- On page 5 of the proposed label remove heightened efficacy claim "Power" from the label.
- On page 5 of the proposed label asterisks must follow [Fungicide] [Fungicidal] [Virucide] and [Virucidal] on the label.
- On page 6 of the proposed label remove the implied safety claims "Gently and Gentle" everywhere it appears.
- On page 6 of the proposed label the term "Professional" has been removed.

g. Add the "Environmental Hazards" statement for the appropriate container size to the label.


h. This product is for non-food use surfaces, so all references to food-use surfaces have been removed.

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

4. Submit the required 1 year Storage Stability and Corrosion Characteristics data.

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 copy of the label is enclosed for your records. Should you have any questions regarding this letter, please contact me either by phone at (703) 308-6345 or email at Henson.Wanda@epa.gov.

Sincerely,

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

Enclosures: (Stamped Label)

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PHARAOH

EPA Reg. No. 64240-___, February 18, 2011,

[Language in brackets is optional or alternate wording.]

Bold italicized text is information for the reviewer, not intended as part of label language.

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 21 2011

PHARAOH

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **64240-69**

ACTIVE INGREDIENT:	
SODIUM HYPOCHLORITE.....	1.3%
OTHER INGREDIENTS:	98.7%
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.]

Net [Contents] [Weight]: _____

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PHARAOH

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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 

-or-

Quality & Responsibility 

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 

UPC bar code

Distributed by [Combat Insect Control Systems][**Supplemental Distributor - TBD**]
[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]

EPA Reg. No. 64240-___

EPA Est. No. _____

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PHARAOH

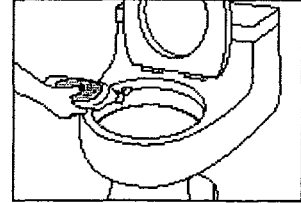
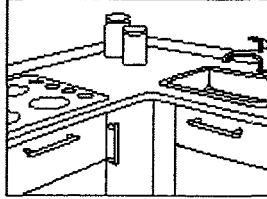
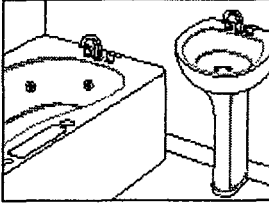
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May include the following or other illustrations or graphic depictions of the container in use or other usage sites as permitted by accepted label claims.



DIRECTIONS FOR 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 and drain the bowl. Apply [½ 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 3 minutes before flushing.

To disinfect hard, nonporous surfaces: Apply at full strength and leave on 3 minutes. Rinse and wipe clean. For heavy soil, preclean surface before disinfecting.

To remove [and inhibit the growth of] mold and mildew: Leave on 3 minutes. Rinse and wipe clean.

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, 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 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:

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.

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10**Optional Claims for Front or Back Panel****Disinfectancy-related bullets/bursts/sentences:**

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

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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.]
6. Removes Mold and Mildew
7. Inhibits [Growth of] Mold and Mildew

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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 | 15. [Wow] Stay-Clean Cap | 28. Good for [whitening] [brightening] surfaces |
| 2. Commercial | 16. [REDACTED] Soft Scrub with a [Clean] [Fresh] [Mountain Breeze] Scent | 29. [REDACTED] Surfaces* See Directions (ATTENTION) |
| 3. Custodian/Custodial | 17. Great Value | 30. Value Size |
| 4. Deodorizes | 18. Multi-surface cleaner | 31. 50% more than the 24 ounce size |
| 5. Food Service | 19. Tough cleaning [action] [power] | 32. [Look] [Wow] 20% -or- 25% -or- 30% -or- 35% -or- 50% Bonus [Ounces] |
| 6. [REDACTED] Bleaches out tough stains | 20. Thick formula sticks to stains | 33. Bonus Size |
| 7. Has a [clean] [pleasant] [fresh] [Mountain Breeze] [scent] [fragrance] | 21. [Great] [Good] for heavy duty cleaning | 34. The Ultimate Clean[!] |
| 8. [Mountain Breeze] [scent] [fragrance] | 22. Grease Cutting | 35. A Clean You Can Trust[!] |
| 9. Industrial | 23. Brightens as it cleans | 36. A Clean You Can See and Feel[!] |
| 10. Institutional | 24. Stain-fighting [power] [action] | 37. [REDACTED], The Clean of Soft Scrub |
| 11. Stain Fighting | 25. [Wow] Easy Squeeze | 38. A Product [of] [in] [the] [Dial] [Henkel] Professional [Products] Series |
| 12. [REDACTED] bleach with a [great] [fresh] scent | 26. [Wow] Clean Squeeze | 39. Henkel Consumer Goods Inc. |
| 13. Tough on [stains] [grease] [soap scum] | 27. NEW[!] Bleach [REDACTED] {Cleanser} [Cleaner] | 40. [Dial] [Henkel] [Commercial] [Professional] [Products] [Series] |
| 14. Tough on greasy dirt, [and] mildew stains [and] soap scum | | 41. [Improved] Stain Fighting |
| | | 42. Tough stain fighter |

[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 | |
| | 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"]



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[KOSHER] [U]

[Kosher symbol of The Union of Orthodox Jewish Congregations]

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Front or Back Label

List A Surface Options:

Hard, Nonporous Surfaces for Disinfecting and Cleaning:

- | | | |
|---|---|--|
| 1. [Bath] tub [Imitation] [Cultured] [Synthetic] marble | 9. [Sealed] Fiberglass | 18. Nonporous [Hard] [Solid] [Engineered] Surfaces |
| 2. [Redacted] [and] [Outside] [of] Dishwashers | 10. Glass [Shower] [Doors] | 19. Outdoor Furniture |
| 3. [Redacted] [and] [Outside] [of] Microwaves | 11. Plastic Laminate [Formica] | 20. Oven doors |
| 4. [Redacted] [and] [Outside] [of] Refrigerators | 12. Glazed [Ceramic] tile | 21. Sealed Granite |
| 5. Bathroom [sink] [countertop] [counter] [tile] [floors] [fixtures] [appliances] | 13. Glazed Porcelain | 22. Shower [stalls] [walls] |
| 6. Garbage Can[s] | 14. Hard surface floors | 23. Stainless Steel |
| 7. Trash Can[s] | 15. Kitchen [sink] [countertop] [counter] [tile] [floors] [fixtures] [appliances] | 24. Stove Tops |
| 8. Waste Receptacle[s] | 16. Locker rooms | 25. Tabletops |
| | 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 <i>Facilities</i> | 6. Manufacturing [facilities][plants][Manufacturers] | 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 |