

64240-69

10/16/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

OCT 16 2011

Georgia Anastasiou  
Lewis & Harrison  
122 C Street, NW, Suite 740  
Washington, DC 20001

Subject: Combat Insect Control Systems, Inc.  
Pharaoh  
EPA Registration No. 64240-69  
Application Date: August 8, 2011  
Receipt Date: August 8, 2011

Dear Ms. Anastasiou:

This amendment submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with conditions.

**Conditions:**

1. This label states that this product may be used as a deodorizer. You must provide adequate dosage recommendations and deodorizer use directions.
2. Revise the following claims to add "on hard non porous surfaces."
  - Removes Mold and Mildew
  - Inhibits Growth of Mold and Mildew

**General Comments:**

A stamped copy of the labeling accepted with conditions is enclosed. Submit one copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions concerning this letter, please contact Wanda Henson on (703) 308-6345 or at [Henson.Wanda@epa.gov](mailto:Henson.Wanda@epa.gov).

Sincerely,

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

CONCURRENCES

|         |           |          |  |  |  |  |  |  |
|---------|-----------|----------|--|--|--|--|--|--|
| SYMBOL  | 7510P     | 7510P    |  |  |  |  |  |  |
| SURNAME | W. Henson | Harris   |  |  |  |  |  |  |
| DATE    | 10-14-11  | 10-16-11 |  |  |  |  |  |  |

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**PHARAOH**

EPA Reg. No. 64240-69, August 8, 2011 (wear protective eyewear)

[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:**

OCT 16 2011

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

**PHARAOH**

**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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**PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals.**

**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 protective eyewear. Wash thoroughly with soap and water after handling and before eating drinking, chewing gum, using tobacco or using the restroom.

**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.

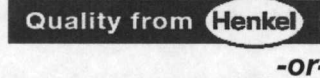
**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. In either case, call a poison control center or doctor for treatment advice.

**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.}*



-or-



-or-



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

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

EPA Est. No. \_\_\_\_\_

**PHARAOH**

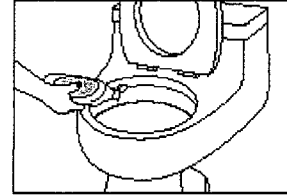
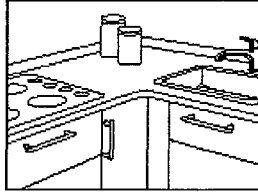
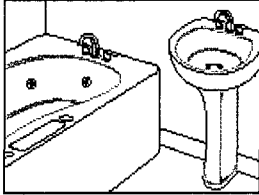
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***May include the following or other illustrations or graphic depictions of the container in use or other usage sites as permitted by accepted label claims.***



**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 [ $\frac{1}{2}$  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 3 minutes before flushing.

**To disinfect hard, nonporous surfaces:** Squeeze directly onto surface or use a [damp] sponge to apply at full strength and leave on 3 minutes. For heavy soil, pre-clean surface before applying product.

**To remove [and inhibit the growth of] mold and mildew on hard, nonporous surfaces:** Squeeze directly onto surface or use a [damp] sponge to apply at full strength and leave on 3 minutes. For heavy 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.]

***{Note to Reviewer: The following statement will be used when product is intended for use in hospitals}***

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 the 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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

**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.

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***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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***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] [Germs]
5. Kills germs while it cleans
6. Disinfectant
7. Disinfecting [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-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. Leaves Surfaces Sanitized or Disinfected
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. \*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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***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. Soft Scrub with a [Clean] [Fresh] [Mountain Breeze] Scent | 29. )   |
| 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]                                   | 32. [Look] [Wow] 20% -or- 25% -or- 30% -or- 35% -or- 50% Bonus [Ounces] |
| 6. [ ] 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 [action]                                   | 37. , The Clean of Soft Scrub   |
| 11. Stain Fighting  | 25. [Wow] Easy Squeeze  | 38. A Product [of] [in] [the] [Dial] [Henkel]                           |
| 12. 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 {Cleanser} [Cleaner]                        | 40. [Dial] [Henkel] [Commercial] [(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]  | 9. [Sealed] Fiberglass  | 18. Nonporous [Hard] [Solid] [Engineered] Surfaces |
| 2. [Synthetic] marble   | 10. Glass [Shower] [Doors]  | 19. Outdoor Furniture                              |
| 3. [Outside] [of] Dishwashers   | 11. Plastic Laminate [Formica]  | 20. Oven doors                                     |
| 4. [Outside] [of] Microwaves  | 12. Glazed [Ceramic] tile   | 21. Sealed Granite                                 |
| 5. [Outside] [of] Refrigerators   | 13. Glazed Porcelain  | 22. Shower [stalls] [walls]                        |
| 6. Bathroom [sink] [countertop] [counter] [tile] [floors] [fixtures] [appliances] | 14. Hard surface floors   | 23. Stainless Steel                                |
| 7. Garbage 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    | 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                      |