

64240-70

9/24/2012

1/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 24, 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Christina M. Swick
Agent for Combat Insect Control Systems
Lewis & Harrison
122 C Street NW Ste. 740
Washington DC 20001

Subject: Edith
EPA Reg.#: 64240-70
Notification Date: July 9, 2012
Receipt Date: July 9, 2012

Dear Ms. Swick:

This acknowledges the receipt of your Amendment application dated July 9, 2012 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended.

Proposed Label Amendment:

The submission was to amend the product label for "Edith" product label (EPA Reg.#: 64240-70). The submitted proposed label dated July 9, 2012 was amended and revised including:

1. Revise label in response to EPA's comments dated March 7, 2012.
2. Delete "foam" application from Direction for Uses as per EPA's Efficacy Report dated February 27, 2012.
3. Kosher symbol was retained on the label.

General Comment:

Based on the review of the material submitted, the amendment for Edith (EPA Reg.#: 64240-70) is acceptable with the following comments:

- P2. - Place the "**PRECAUTIONARY STATEMENTS**" outside the "First Aid" statement box. Also add "**Keep Out of Reach of Children**" just right below **PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals.**
- P2. - Within the "First Aid" statement box add "**For emergency information call the poison control center at 1-800-222-1222**" {see LRM chapt.3}.

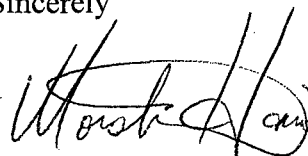
- P.9 – Delete the Kosher Symbol on the label because the “**Orthodox Union Letter of Certification**” was for Soft Scrub brands produced by Henkel Consumer Goods Inc., but did not include Edith product (EPA Reg.#: 64240-70). You can post Kosher Symbol on the label when the “**Orthodox Union Letter of Certification**” specifically also mentions that Edith product (EPA Reg.#: 64240-70).

A copy of the accepted with comment stamped label is enclosed for your record. Please submit one copy of your final printed label/labeling before distributing or selling the product bearing the revised label/labeling.

This amendment and letter have been inserted in your file for future reference.

If you have any questions or comments concerning this letter, please contact liem.david@epa.gov or call (703) 305-1284.

Sincerely



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

Enc: Accepted with comments stamped label

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EDITH

EPA Reg. No. 64240-70, July 9, 2012,

[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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EDITH

ACTIVE INGREDIENT:	
SODIUM HYPOCHLORITE.....	1.75%
OTHER INGREDIENTS:.....	98.25%
TOTAL.....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

[Read back panel carefully]

[See back panel for additional precautionary statements.]

[See precautionary statements on back panel.]

ACCEPTED
with COMMENTS
in EPA Letter Dated:
SEP 24 2012

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

64240-70

Net [Contents] [Weight]: _____

[Batch Code: _____]

EDITH

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FIRST AID:

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF ON SKIN: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

~~FOR EMERGENCY INFORMATION CALL THE POISON CENTER AT 1-800-222-1222~~

PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals.

CAUTION: Causes moderate eye irritation. Harmful if inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Physical & Chemical Hazards: Contains bleach. Avoid contact with clothes, fabric, wood, vinyl, painted surfaces, wallpaper 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.}

add.

add.

more
subtle
First Aid box

more outside
First Aid B

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EDITH

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Quality from 

-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. 64240-70

EPA Est. No. _____

EDITH

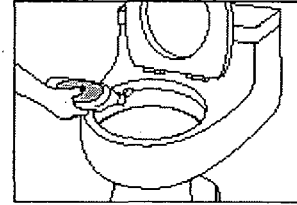
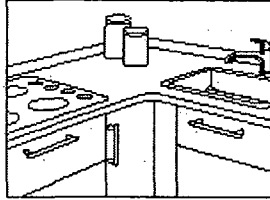
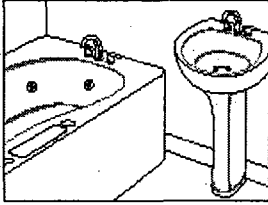
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May include the following or other illustrations or graphic depictions of the container in use or other usage sites as permitted by accepted label claims.



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

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, 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, aluminum, colored grout, copper and brass. Avoid contact with clothes, wood, fabric, vinyl, painted surfaces, wallpaper or carpet. Prolonged contact with metal, old porcelain or plastic countertops may cause discoloration.

To clean and deodorize:

- [1] Open screen and rotate to "SPRAY" [*graphic depiction of the nozzle in SPRAY position*]
- [2] Spray 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 disinfect hard non-porous surfaces: Apply product [by spray] and leave on surface for 30 seconds before wiping clean. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

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

To clean inside toilet bowl: Spray sides and under rim of toilet bowl. Let stand for several minutes, then brush and flush.

To disinfect inside toilet bowl: Empty water from toilet. Spray sides and under rim of toilet bowl. Let stand for 30 seconds, then brush and flush. Heavily soiled surfaces must be pre-cleaned prior to disinfecting.

{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 preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

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Note to Reviewer:

Below are the Storage & Disposal Statements for Product Distributed Only for Household Residential Use

Storage & Disposal

Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood area with large quantities of water. Product or rinsate that cannot be used should be diluted with water before disposal in a sanitary sewer. Do not reuse empty container but place in trash collection. Do not contaminate food or feed by storage, disposal or cleaning of equipment.

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

1. Bleaches out stains & disinfects
2. Antibacterial [Action] [Cleaner] [Cleanser]
3. Kills [odor-causing] [Bacteria] [Germs*]
4. Kills germs* while it cleans
5. [Disinfectant] [Disinfecting] [Cleaner] [Cleanser]
6. Disinfects [As It Cleans]
7. Disinfects and Deodorizes [By Killing [Germs*] [Bacteria] and Their Odors]
8. [Multi-Room] [Multi-Purpose] [All-Purpose] [Multi-Surface] [Disinfectant] [Cleanser] [Cleaner]

9. Kills the Following Microorganisms:
 [Escherichia coli [ATCC 11229] (E. coli) **-and/or-**
 Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) **-and/or-**
 Salmonella enterica [ATCC 10708] (Salmonella) **-and/or-**
 Shigella sonnei (Shigella) [ATCC 25931] **-and/or-**
 Staphylococcus aureus [ATCC 6538] (Staph) **-and/or-**
 Methicillin-Resistant Staphylococcus aureus [ATCC 33592] (MRSA) **-and/or-**
 Athlete's foot fungus [Trichophyton mentagrophytes [ATCC 9533]
 [on] [in] [at] **surface option(s) from List A**]
 in 30 seconds

10. Kills [99.9% of] [common] [household] [germs*] [bacteria] [including]:
 *[Escherichia coli [ATCC 11229] (E. coli) **-and/or-**
 Pseudomonas aeruginosa [ATCC 15442] (Pseudomonas) **-and/or-**
 Salmonella enterica [ATCC 10708] (Salmonella) **-and/or-**
 Shigella sonnei [ATCC 25931] (Shigella) **-and/or-**
 Staphylococcus aureus [ATCC 6538] (Staph) **-and/or-**
 Methicillin-Resistant Staphylococcus aureus [ATCC 33592] (MRSA) **-and/or-**
 Klebsiella pneumoniae [ATCC 4352] **-and/or-**
 Trichophyton mentagrophytes [ATCC 9533] (Athlete's Foot Fungus)]
 [on] [in] [at] **surface option(s) from List A**]
 in 30 seconds

11. [Home] [Bleach] Disinfectant [Cleaner] [Cleanser]
12. Disinfecting Bleach [Cleaner] [Cleanser]
13. One Step [Cleaner] [Cleanser] and [Disinfectant] [Sanitizer]
14. Cleans and disinfects in one step
15. Leaves Surfaces [Sanitized] [Disinfected]
16. [Eliminates] [Wipes out] odors caused by [bacteria] [germs*] [microorganisms]
17. [Fungicide] [Fungicidal]
18. [Bactericide] [Bactericidal]
19. [Germicide*] [Germicidal*]
20. Cleans and kills on [hard, nonporous surface] **surface option(s) from List A** in one step
21. **surface option(s) from List A** Disinfectant
22. Disinfects **surface option(s) from List A**
23. [An] Effective [disinfectant] [cleanser] [deodorant] [for] [in] [at] **surface option(s) from List A**

24. Hospital Disinfectant [Cleaner] [Cleanser]
25. Industrial Disinfectant [Cleaner] [Cleanser]
26. Institutional Disinfectant [Cleaner] [Cleanser]

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Optional Claims for Front or Back Panel

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. Inhibits [Growth of] Mold and Mildew
7. Removes mold and mildew [stains]

8. *Kills Rhinovirus [ATCC VR-340] [Type 39] in 30 seconds
9. *Kills Influenza A [ATCC VR-544] [Virus] in 30 seconds
10. [Virucide*] [Virucidal*]

10
|
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Optional Claims for Front or Back Panel

1. [Cleans] [Fights] [Removes] [tough] stains
2. Brightens as it cleans
3. Good for [whitening] [brightening] surfaces
4. Bleaches out tough stains
5. Stain fighting
6. Tough stain fighter
7. Tough on [stains] [grease] [soap scum]
8. Tough cleaning [action] [power]
9. Stain-fighting [power] [action]
10. Ultimate stain removal
11. The [stain removal] [disinfecting] [action] of bleach with a [great] [fresh] scent
12. The [stain removing] power of bleach, the clean of Soft Scrub
13. Tough on greasy dirt, [and] mildew stains [and] soap scum
14. [The] tough [stain removing] [cleaning] [action] of bleach
15. The [stain removing] [disinfecting] [germ* killing] of Soft Scrub with a [Clean] [Fresh] Scent
16. [Cleans] [Fights] [Removes] [tough] Stains
17. Tough [Great] [on] [for] [stains] [calcium] [lime scale] [hard water] [soap scum] [rust] [soils] [greasy dirt] outdoor soils
18. [Great] [Good] for heavy duty cleaning
19. Cleans [& deodorizes] your entire bathroom – even [inside] [the] toilet[s]
20. Strong enough for your toilet
21. Grease cutting
22. The Ultimate Clean[!]
23. A clean you can trust[!]
24. A clean you can see and feel[!]
25. Makes cleaning the bathroom easier
26. Saves time when cleaning
27. Cleans your bathroom inside and out
28. Cleans to the Nth degree
29. Totally rethink clean
30. Multi-Surface Cleaner
31. [Great] [Good] For Heavy Duty Cleaning
32. Your Complete Bathroom [Caddy] [Arsenal] [In One Product]
33. Easy To Use Trigger
34. [Trigger] [Even] [Sprays] [Works] [Upside Down] [Sideways] ***[May include an illustration or graphic depiction of the container shown upside down.]***
35. Foam or Spray
36. Foam (Closed Screen)
37. Spray (Open Screen)
38. Sprays a thick foam and a fine mist
39. Powerful foaming action
40. Sprays 360 degrees
41. Thick foam clings to [toilet bowl] [sides of toilet] [shower walls] [tubs]
42. One product[,-] multiple uses
43. Has a [clean] [pleasant] [fresh] [scent] [fragrance]
44. Fresh Scent
45. Deodorizes
46. [A Product] [of] [in] [the] [Dial] [Henkel] [Henkel Consumer Goods Inc.] [Professional] [Products] [Series]
47. [Commercial] [Custodian/Custodial] [Industrial] [Institutional] [Food Service]
48. Residential

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Optional Claims for Front or Back Panel

[Removes] [Cleans [Away]]...

1. [Bathroom] soils
2. [Food] [coffee] [tea] [mildew] [juice] stains
3. Kitchen Stains
4. [General household] dirt
5. [Bathroom] [Kitchen] [Food] Soils
6. [Tough] [Burnt-on] [Dried] Food
7. [Hard] water deposits
8. [Tough] [Greasy] dirt
9. Tough [stains] [soils]
10. Bathroom dirt
11. Bathroom stains
12. Bathtub rings
13. Fingerprints
14. Smudges
15. Grime
16. Mineral deposits
17. Pot marks
18. Soap scum
19. Toilet ring
20. Mold and Mildew Stains
21. [Tough] Grease [and Grime]
22. [Toilet] Rust
23. Limescale
24. Calcium
25. [White] [Non-colored] Grout

Other Optional Claims: To be used only upon consent of the relevant third party

["NSF Listed"]



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~~[KOSHER] [U]~~

~~[Kosher symbol of The Union of Orthodox Jewish Congregations]~~

delete

delete

12/12

EDITH

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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
2. [Outside] [of] Dishwashers
3. [Outside] [of] Microwaves
4. [Outside] [of] Refrigerators
5. Bathroom [sink] [countertop] [counter] [tile] [floors] [fixtures] [appliances]
6. Garbage Can[s]
7. Trash Can[s]
8. Waste Receptacle[s]
9. Sealed Fiberglass
10. Glass [Shower] [Doors]
11. Plastic Laminate [Formica]
12. Glazed [Ceramic] tile
13. Glazed Porcelain
14. Hard surface floors
15. Kitchen [sink] [countertop] [counter] [tile] [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 [stalls] [walls]
23. Stainless Steel
24. Stove Tops
25. Tabletops
26. Toilets
27. Glass-top Stove[s]
28. Quartz [counter top[s]] [surfaces]

Locations for Disinfecting and Cleaning:

1. Hospitals
2. Healthcare
3. Nursing homes
4. Institutions
5. Industrial facilities
6. Manufacturing [facilities][plants][Manufacturers]
7. [Hotels] [Motels]
8. Correctional institutes
9. Detention [Centers][Facilities]
10. Prisons
11. Public transportation
12. Office buildings
13. Day care [centers][facilities]
14. [Schools][Colleges][Universities]
15. Sports facilities
16. Health clubs