

JUNE 5, 2000

Ms. Janice K. Saiki
 Senior Regulatory Scientist
 CLOROX PROFESSIONAL PRODUCTS COMPANY
 C/O PS & RC
 P. O. Box 493
 Pleasanton, CA 94566-0803

Subject: Label Revisions-Additional Label Claims
 CPPC SPRAY 1
 EPA Registration Number 676193
 Your Amended Application Dated May 18, 2000

Dear Ms. Saiki:

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Revise the "First Aid Statements" in accordance with PR Notice 2000.03. In addition, you must include first aid instructions for dermal (If On Skin) contact. The first aid statements should be placed above the precautionary statements, under the heading "FIRST AID." The first aid statement must be separated from the precautionary statement text.
2. The word "WARNING" in the precautionary section must be grouped with the precautionary heading and displayed as follows:

**"PRECAUTIONARY STATEMENTS"
 HAZARD TO HUMANS & DOMESTIC ANIMALS
 WARNING"**

Note that all of the wording must be given equal prominent.

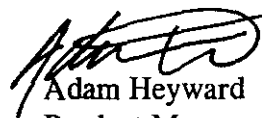
CONCURRENCES

| SYMBOL | | | | | | | |
|---------|--|--|--|--|--|--|--|
| SURNAME | | | | | | | |
| DATE | | | | | | | |
| | | | | | | | |

- 3. Under the General Claims section, delete the following statements:
 - a). A breakthrough in fighting bacteria.
 - b). Delete viruses and it's directions from the sanitization claims section. There are no acceptable protocol or efficacy data to support the claim as a sanitizer.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,



Adam Heyward
Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

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Note: Italicized text is information for the reader and is not part of the label. [Bracketed information is optional text.]
Text separated by a diamond bullet (♦) denotes -and/or- options.

(67619-3) CPPC Spray 1 1 of 4

ACCEPTED
with COMMENTS
in EPA Letter Dated:
JUN - 5 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. 67619-3

CPPC SPRAY 1

| | |
|--|-----------|
| ACTIVE INGREDIENTS: | |
| Octyl decyl dimethyl ammonium chloride | 0.1890% |
| Diocetyl dimethyl ammonium chloride | 0.0945% |
| Didecyl dimethyl ammonium chloride | 0.0945% |
| Alkyl (50% C14, 40% C12, 10% C16) dimethyl benzyl ammonium chlorides | 0.2520% |
| Ethanol | 65.0000% |
| INERT INGREDIENTS: | |
| TOTAL: | 100.0000% |

KEEP OUT OF REACH OF CHILDREN

WARNING: See back panel for first aid.

NET WT. _____ OZ.

This product must not result in the direct or indirect contamination of food products.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eye wear (safety glasses). Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. ~~Wash thoroughly with soap and water after handling.~~ If skin contact with product occurs, wash thoroughly with soap and water, especially prior to food handling and preparation. Remove contaminated clothing and wash before reuse.

FIRST AID: IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

PHYSICAL HAZARDS: Flammable: Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° Fahrenheit may cause bursting.

Storage/Disposal: Do not contaminate water, food, or feed by storage and disposal. Store at temperatures below 130° Fahrenheit. Do not puncture or incinerate. Do not reuse empty container. Recycle empty container. -or- Discard in trash.

-or-

This container may be recycled in aerosol recycling centers. At present, there are only a few such centers in the U.S. Before offering for recycling, empty the can by using the product according to the label (DO NOT PUNCTURE!). If recycling is not available, wrap the container and discard in the trash.

-or-

Empty the can by using the product according to the label (DO NOT PUNCTURE). Some recycling centers accept these steel containers. Otherwise, wrap container and discard in trash.



Questions? Comments? Call toll-free 1-888-797-7225
Mfd. for Clorox Professional Products Company, Oakland, CA 94612
© 1997 The Clorox Company
EPA Reg. No. 67619-3
EPA Est. No. 11525-IL-1

Contains no phosphorus
Contains no CFCs or other ozone depleting substances
Federal Regulations Prohibit CFC Propellants in Aerosols

R0293-3

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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.
Thoroughly clean surfaces or objects prior to application of product. [Shake well.] ~~FOR USE ON NON-FOOD CONTACT SURFACES ONLY.~~
A potable water rinse is required for surfaces which may be in direct contact with food [such as countertops and high chairs].

DEODORIZATION

To deodorize: Spray on precleaned surfaces as needed.

Claims:

- Eliminates [mold and mildew] odor[s]
- Eliminates -or- reduces [kitchen] odors [such as trash can -or- recycling bin odors -or- smells] [caused by germs, bacteria or mildew listed on the label]
- Eliminates pet odors [~~such as cat litter odors~~] caused by germs, bacteria or mildew
- [This product] eliminates odors at the source [by killing 99.9% of the germs that cause [unpleasant] odors].
- [This product] eliminates odors at their source caused by germs, bacteria or mildew.
- Deodorizes and/or disinfects -or- helps deodorize
- [This product] deodorizes by killing the germs that cause odors.
- Kills odor causing bacteria -or germs
- Kills -or- eliminates bacteria that cause [bad] odors
- [This product] kills the germs that cause [unpleasant] [bad] odors.
- This formulation doesn't mask odors.

Use Sites:

Use on hard, nonporous surfaces in:

Bathrooms ♦ Restrooms ♦ Kitchens ♦ Garages ♦ Hotels ♦ Motels ♦ Institutions ♦ Public Facilities ♦ Offices ♦ Public Telephone[s] [Booths] ♦ [Institutional] Laundromats ♦ Churches ♦ Military Installations ♦ Schools ♦ Day Care Centers ♦ Nurseries ♦ Dorms ♦ Shelters ♦ Laboratories ♦ Pharmacies ♦ Health Clubs ♦ Gymnasiums ♦ Recreational Centers ♦ Recreational Facilities ♦ Cafeterias ♦ Restaurants ♦ Institutional Kitchens ♦ Supermarkets ♦ Grocery Stores ♦ Butcher Shops ♦ [Food Processing] Plants ♦ Warehouse Clubs ♦ Automobiles ♦ Cars ♦ School Buses ♦ Boats ♦ Campers ♦ Mobile Homes ♦ Ambulances ♦ Bowling Alleys ♦ Playgrounds ♦ Vacation Homes ♦ Play Areas ♦ Factories ♦ Shops ♦ Convenience Stores ♦ [Damp] Storage Areas ♦ Bathroom -or- Locker Room Facilities ♦ Kennels

For use on:

Recycling Bins ♦ Garbage Cans ♦ Garbage Disposals ♦ Trash Cans ♦ Waste Baskets ♦ Trash Compactors ♦ Diaper Pails ♦ Diaper Changing Tables ♦ [Clothes] Hampers ♦ Toilets ♦ Exteriors ♦ Toilet Seats ♦ Floor Around Toilets ♦ Toilet Area ♦ [Under] Sinks ♦ Drain Boards ♦ Pet Areas [~~Cat Litter Boxes~~] ♦ Faucets ♦ ~~Doorknobs~~ ♦ Telephones ♦ Bathtubs ♦ Showers ♦ Plastic Shower Curtains ♦ Walls ♦ Glazed Tiles ♦ [Shower] Doors ♦ Floors ♦ Medicine Cabinets ♦ Counter Tops ♦ Stove Tops ♦ Cabinets ♦ [Outside of] Refrigerators ♦ [Outside of] Appliances ♦ [Outside of] Microwaves ♦ Stereo Consoles ♦ [Outside of] Washers/Dryers ♦ Laundry Rooms ♦ Basements ♦ Closets ♦ ~~Lamps~~ ♦ Desks ♦ ~~Metal~~ Work Benches ♦ Filing Cabinets ♦ Patio Furniture ♦ Light Switch Panels ♦ [Children's] Furniture ♦ [High] Chairs ♦ [Toilet] [Faucet] [Telephone] [Dishwasher] [Cabinet] [Door] Handles ♦ Dressing Carts

MOLD AND MILDEW

To control and prevent the growth of mold and mildew:
Spray precleaned surface until thoroughly wet. Surface must remain wet for 10 minutes before wiping or air drying. Respray product as necessary for ongoing -or- continual control.

Claims:

- Controls [and] [prevents] mold and mildew growth. Respray product as necessary.
- Kills and prevents the growth of molds and mildew. Respray product as necessary.
- Kills -or- helps kill -or- helps eliminate allergen causing molds* [commonly found].
- Proven effective against common allergen causing molds*.
- Stop[s] -or- helps keep mold and mildew from coming back. Respray product as necessary.

Organisms:

Kills mold and mildew such as:

*Alternaria alternata, Aspergillus niger [mildew], Cladosporium herbarum

Use on hard, nonporous surfaces in:

Bathrooms ♦ Restrooms ♦ Kitchens ♦ Garages ♦ Hotels ♦ Motels ♦ Institutions ♦ Public Facilities ♦ Offices ♦ Public Telephone[s] [Booths] ♦ [Institutional] Laundromats ♦ Churches ♦ Military Installations ♦ Schools ♦ Day Care Centers ♦ Nurseries ♦ Dorms ♦ Shelters ♦ Laboratories ♦ Pharmacies ♦ Health Clubs ♦ Gymnasiums ♦ Recreational Centers ♦ Recreational Facilities ♦ Cafeterias ♦ Restaurants ♦ Institutional Kitchens ♦ Supermarkets ♦ Grocery Stores ♦ Butcher Shops ♦ [Food Processing] Plants ♦ Warehouse Clubs ♦ Automobiles ♦ Cars ♦ School Buses ♦ Boats ♦ Campers ♦ Mobile Homes ♦ Ambulances ♦ Bowling Alleys ♦ Playgrounds ♦ Vacation Homes ♦ Play Areas ♦ Factories ♦ Shops ♦ Convenience Stores ♦ [Damp] Storage Areas ♦ Bathroom -or- Locker Room Facilities ♦ Kennels

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DISINFECTION

To Disinfect: Spray 6 to 10 inches from pre-cleaned surface for 3-4 seconds until thoroughly wet. Surface must remain wet for 10 minutes before wiping.

Specific Instructions for *HIV-1:

This product kills *HIV-1 on pre-cleaned surfaces/objects previously soiled with blood/body fluids in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of Human Immunodeficiency Virus Type 1 (*HIV-1) (associated with AIDS).

Special Instructions for Using this product to Clean and Decontaminate Against *HIV-1 on Surfaces/Objects Soiled with Blood/Body Fluids

Personal Protection: When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks, and eye coverings.

Cleaning Procedure: Blood and other body fluids must be thoroughly cleaned from surfaces and other objects before applying this product.

Contact Time: Spray 6 to 10 inches from pre-cleaned surface for 3-4 seconds until thoroughly wet. Surface must remain wet for 10 minutes before wiping or air drying.

Disposal of infectious materials: Use disposable latex gloves, gowns, masks, and eye coverings. Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal.

Claims:

- [Bathroom] [Restroom] [Kitchen] disinfectant
- Antimicrobial
- [New] Disinfecting spray
- Virucidal*
- Germicidal
- Fungicidal
- Bactericidal
- Streptocidal
- Staphylocidal
- Pseudomonacidal
- Tuberculocidal
- Multi-purpose disinfectant [spray]
- Anti-bacterial [spray] [action] [formula]
- Disinfecting formula
- Disinfects
- Leaves hard, nonporous surfaces sanitary -or- disinfected in 10 minutes
- [This product] kills germs throughout the kitchen -or- restaurant -or- establishment -or- building on hard, nonporous surfaces plus controls mold and mildew growth
- [This product] kills 99.9% of bacteria & viruses*
- [This product] kills bacteria, viruses,* mold and mildew
- This product meets AOAC Germicidal Spray Product Test efficacy standards for hospital disinfectants

Organisms:

[This product] kills germs such as: -or- Kills -or- Disinfects against the following bacteria, viruses*, mold and mildew:
Bacteria: *Pseudomonas cepacia* [(*Burkholderia cepacia*)] ♦ *Camylobacter jejuni* ♦ *Corynebacterium diphtheriae* ♦ *Enterobacter aerogenes*

♦ *Enterococcus faecalis* (Vancomycin resistant) ♦ *Escherichia coli* 0157:H7 [E. coli] ♦ *Klebsiella pneumoniae* ♦ *Listeria monocytogenes* ♦ *Mycobacterium bovis* (Tuberculosis) ♦ *Mycobacterium smegmatis* ♦ *Proteus mirabilis* ♦ *Proteus vulgaris* ♦ *Pseudomonas aeruginosa* [pseudomonas] ♦ *Pseudomonas putida* ♦ *Salmonella choleraesuis* [salmonella] ♦ *Salmonella choleraesuis paratyphi B1* [schottmuelleri] ♦ *Salmonella choleraesuis serotype enteritidis* ♦ *Staphylococcus aureus* (Methicillin & Gentamicin resistant) ♦ *Serratia marcescens* ♦ *Shigella dysenteriae* ♦ *Staphylococcus aureus* [staph] ♦ *Streptococcus pyogenes* [strep]

*Viruses: ♦ Adenovirus type 2 (Adenoid 6) ♦ Cytomegalovirus ♦ Echovirus ♦ Hepatitis A virus ♦ Herpes simplex virus type 1 ♦ Herpes simplex virus 2 ♦ Human Immunodeficiency Virus Type 1 (HIV-1) ♦ Influenza A2 virus (Hong Kong) [Flu virus] ♦ Influenza virus type B ♦ Polio virus ♦ Respiratory syncytial virus [(leading cause of lower respiratory infection in children)] ♦ Rhinovirus [(cold virus)] ♦ Rhinovirus 39 ♦ Vaccinia virus ♦ Rotavirus [(leading cause of infectious diarrhea in children)]

Fungi: ♦ *Alternaria alternata* ♦ *Aspergillus niger* [mildew] ♦ *Candida albicans* ♦ *Cladosporium herbarum* ♦ *Trichophyton mentagrophytes* [(Athlete's foot fungus)]

Use on hard, nonporous surfaces in:

Bathrooms ♦ Restrooms ♦ Kitchens ♦ Garages ♦ Hotels ♦ Motels ♦ Institutions ♦ Public Facilities ♦ Offices ♦ Public Telephone[s] [Booths] ♦ [Institutional] Laundromats ♦ Churches ♦ Military Installations ♦ Schools ♦ Day Care Centers ♦ Nurseries ♦ Dorms ♦ Shelters ♦ Laboratories ♦ Pharmacies ♦ Health Clubs ♦ Gymnasiums ♦ Recreational Centers ♦ Recreational Facilities ♦ Cafeterias ♦ Restaurants ♦ Institutional Kitchens ♦ Supermarkets ♦ Grocery Stores ♦ Butcher Shops ♦ [Food Processing] Plants ♦ Warehouse Clubs ♦ Automobiles ♦ Cars ♦ School Buses ♦ Boats ♦ Campers ♦ Mobile Homes ♦ Ambulances ♦ Bowling Alleys ♦ Playgrounds ♦ Vacation Homes ♦ Play Areas ♦ Factories ♦ Shops ♦ Convenience Stores ♦ [Damp] Storage Areas ♦ Bathroom -or- Locker Room Facilities ♦ Kennels

For use on:

Recycling Bins ♦ Garbage Cans ♦ Garbage Disposals ♦ Trash Cans ♦ Waste Baskets ♦ Trash Compactors ♦ Diaper Pails ♦ Diaper Changing Tables ♦ [Clothes] Hampers ♦ Toilets ♦ Exterior* Toilet Seats ♦ Floor Around Toilets ♦ Toilet Arms ♦ [Under] Sinks ♦ Drain Boards ♦ Pet Areas [Cat Litter Boxes] ♦ Faucets ♦ Doorknobs ♦ Telephones ♦ Bathtubs ♦ Showers ♦ Plastic Shower Curtains ♦ Walls ♦ Glazed Tiles ♦ [Shower] Doors ♦ Floors ♦ Medicine Cabinets ♦ Counter Tops ♦ Stove Tops ♦ Cabinets ♦ [Outside of] Refrigerators ♦ [Outside of] Appliances ♦ [Outside of] Microwaves ♦ Stereo Consoles ♦ [Outside of] Washers/Dryers ♦ Laundry Rooms ♦ Basements ♦ Closets ♦ Lamps ♦ Desks ♦ Metal Work Benches ♦ Filing Cabinets ♦ Patio Furniture ♦ Light Switch Panels ♦ [Children's] Furniture ♦ [High] Chairs ♦ [Toilet] [Faucet] [Telephone] [Dishwasher] [Cabinet] [Door] Handles ♦ Dressing Carts

Use on non-critical surfaces in:

Hospitals ♦ Patient rooms ♦ Nursing Homes ♦ Medical Clinics ♦ Examination Rooms ♦ Dental Offices ♦ Physician's Offices ♦ Veterinary Offices

General Claims:

- A breakthrough in fighting bacteria
- Avoid use on [polished] wood, painted surfaces, acrylic plastics
- Color safe
- Convenient
- Does not contain bleach
- For use in homes
- Has a [clean] fresh/lemon/floral scent -or- fragrance -or- smell
- Institutional size
- Professional size
- Safe for -or- will not harm [colored] surfaces and/or [colored] fabrics*
- Is safe for -or- will not harm most hard, nonporous surfaces
- Safe for -or- on colors
- Uniquely formulated†
- except rayon fabrics, leather, vinyl and silk †

Environmental Text:

- [Important Facts about this product]
- This can is made from an average of 25% recycled steel (10% post-consumer)
 - Encourage your local authorities to establish a program to recycle this can.
 - Recyclable.

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SANITIZATION

To Sanitize non-food contact surfaces (in 30 seconds): Spray 6-10 inches from pre-cleaned surface for 3-4 seconds or until thoroughly wet. Surface must remain wet for 30 seconds before air drying.

Organisms:

Sanitizes non-food contact surfaces against the following bacteria and viruses* (in 30 seconds): -or- Sanitizes in 30 seconds against: *Klebsiella pneumoniae*, *Staphylococcus aureus* (staph), **Rhinovirus* (cold virus), **Rotavirus* (deadly cause of infectious diarrhea in children)

Use Sites:

Use on hard, nonporous surfaces in:
Bathrooms ♦ Restrooms ♦ Kitchens ♦ Garages ♦ Hotels ♦ Motels ♦ Institutions ♦ Public Facilities ♦ Offices ♦ Public Telephones [Booths] ♦ [Institutional] Laundromats ♦ Churches ♦ Military Installations ♦ Schools ♦ Day Care Centers ♦ Nurseries ♦ Dorms ♦ Shelters ♦ Laboratories ♦ Pharmacies ♦ Health Clubs ♦ Gymnasiums ♦ Recreational Centers ♦ Recreational Facilities ♦ Cafeterias ♦ Restaurants ♦ Institutional Kitchens ♦ Supermarkets ♦ Grocery Stores ♦ Butcher Shops ♦ [Food Processing] Plants ♦

Warehouse Clubs ♦ Automobiles ♦ Cars ♦ School Buses ♦ Boats ♦ Campers ♦ Mobile Homes ♦ Ambulances ♦ Bowling Alleys ♦ Playgrounds ♦ Vacation Homes ♦ Play Areas ♦ Factories ♦ Shops ♦ Convenience Stores ♦ [Damp] Storage Areas ♦ Bathroom -or- Locker Room Facilities ♦ Kennels

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SANITIZATION - Fabric, Upholstery, Porous Surfaces

To Sanitize Fabric, Upholstery, Porous Surfaces: Spray 6-10 inches from pre-cleaned surface for 2-4 seconds or until thoroughly wet. Surface must remain wet for 10 minutes before air drying.

Claims:

• Sanitizes fabric, upholstery and other porous surfaces
• Kills 99.9% of bacteria* in fabric, upholstery and other porous surfaces
• Kills mold in fabric, upholstery and on porous surfaces

Organisms:

**Protococcus mirabilis*, *Aspergillus niger*

Use Sites:

Use on porous surfaces such as fabric, upholstery in:

Bathrooms ♦ Restrooms ♦ Kitchens ♦ Garages ♦ Hotels ♦ Motels ♦ Institutions ♦ Public Facilities ♦ Offices ♦ [Institutional] Laundromats ♦ Churches ♦ Military Installations ♦ Schools ♦ Day Care Centers ♦ Nurseries ♦ Dorms ♦ Shelters ♦ Laboratories ♦ Pharmacies ♦ Health Clubs ♦ Gymnasiums ♦ Recreational Centers ♦ Recreational Facilities ♦ Cafeterias ♦ Restaurants ♦ Institutional Kitchens ♦ Supermarkets ♦ Grocery Stores ♦ Butcher Shops ♦ [Food Processing] Plants ♦ Warehouse Clubs ♦ Automobiles ♦ Cars ♦ School Buses ♦ Boats ♦ Campers ♦ Mobile Homes ♦ Ambulances ♦ Bowling Alleys ♦ Vacation Homes ♦ Play Areas ♦ Factories ♦ Shops ♦ Convenience Stores ♦ [Damp] Storage Areas ♦ Bathroom -or- Locker Room Facilities ♦ Kennels

For use on:

Pet Areas [Pet Beds] ♦ Curtains ♦ Upholstered Furniture and/or Chairs