

67619-17

08/28/2007
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

August 28, 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

OPP Decision Number: 378448

J. Evelyn Lawson
Senior Regulatory Information Scientist
The Clorox Company
c/o PS&RC
P.O. Box 493
Pleasanton, CA 94566-0803

Subject: Application for Amended Registration
Product Name: Shield
EPA Registration Number: 67619-17
Application Date: April 18, 2007
Receipt Date: April 23, 2007

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

Proposed Amendment

- Add Sanitization claim for :
 1. *Klebsiella Pneumoniae*
 2. *Staphylococcus Aureus*
- Add Disinfection claim for :
 1. *Acinetobacter baumannii*
 2. *Staphylococcus Aureus (MRSA)*
 3. *Shigella dysenteriae*
 4. Poliovirus 1 Chat Strain
 5. Parainfluenza 1 (Sendai)
- Amend labeling to reflect additional organisms

Acceptable Data

1. The submitted efficacy data support the use of the undiluted product, Shield (also known as F2005.0025), as a disinfectant with bactericidal activity against the following microorganisms on hard, non-porous surfaces in the presence of a 5% organic soil load for a contact time of 30 seconds:

<i>Acinetobacter baumannii</i>	MRID 471128-03
<i>Staphylococcus aureus (MRSA)</i>	MRID 471128-04
<i>Shigella dysenteriae</i>	MRID 471128-05

No growth was observed in the subcultures of the required number of carriers tested against the required number of product lots. Carrier counts were at least 10^4 CFU/carrier. Neutralizer effectiveness testing showed positive growth of the microorganisms. Viability controls were positive for growth. Sterility controls did not show growth. Bacteriostasis streaks exhibited no growth.

CONCURRENCES			
SYMBOL	7510P	7510P	
IRNAME	E. B. 1.9	E. T. 1.9	
DATE	8/28/07	8/28/07	

EPA Form 1320-1A (1/90)

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2. The submitted efficacy data support the use of the undiluted product, Shield (also known as F2005.0025), as a disinfectant with virucidal activity against the following microorganisms on hard, non-porous surfaces in the presence of at least a 5% organic soil load for a contact time of 30 seconds (1 minute against Poliovirus 1):

Poliovirus 1
Parainfluenza 1 virus

MRID 471128-10
MRID 471128-11

Plate recovery counts were at least 10^4 . Cytotoxicity was observed in the 10^{-2} dilutions in studies against Poliovirus 1. Complete inactivation (no growth) was indicated in all higher dilutions tested. At least a 3-log reduction in titer was demonstrated beyond the cytotoxic level. Complete inactivation (no growth) was indicated in all dilutions tested against Parainfluenza 1 virus.

3. The submitted efficacy data support the use of the undiluted product, Shield (also known as F2005.0025), as a non-food contact surface sanitizer on hard, non-porous surfaces against the following microorganisms in the presence of a 5% organic soil load for a contact time of 30 seconds:

Staphylococcus aureus
Klebsiella pneumoniae

MRID 471128-02
MRID 471128-02

At least a 99.9% reduction in population was observed in the subcultures of all carriers tested against the required number of lots. At least one of the product lots tested was at least 60 days old at the time of testing. Neutralizer effectiveness testing showed positive growth of the microorganisms. Sterility controls did not show growth.

Labeling Comments

- On page 4 of the proposed label, the listing for *Acinetobacter baumannii* is flagged with † and *. You must confirm the appropriateness of these two flags. Efficacy studies provided demonstrated effectiveness of the product against *Acinetobacter baumannii* at a 30-second contact time; however, the † symbol references a 1-minute contact time for spray applications. Please update to label to reference the accepted 30-second contact time. The label does not provide a description for the * symbol. You must either remove it or add the intended statement.
- On page 3 of the proposed label, the directions for using the product to sanitize indicate that surfaces should be rinsed or wiped clean, when directly applying the product or a use solution to surfaces. This rinse step is identified as optional when applying the product by spray application. In the directions for applying the product or a use solution to surfaces, you may want to place brackets around the phrase: Rinse -or- clean.
- On page 4 of the proposed label, remove the brackets from [type 1] after Poliovirus.
- On page 4 of the proposed label, change "Parainfluenza virus" to read "Parainfluenza 1 virus."
- On page 8 of the proposed label, one disinfection claim indicates that the product, as a spray, "Kills 99.9% of [common] household germs [bacteria -and/or- viruses] in 30 seconds." You must remove this claim from the label because it not accurate. A number of the microorganisms listed on the label (e.g., Poliovirus 1) require a 1-minute or 2-minute contact time for spray applications. 6.
- The label continues to use WARNING as the signal word, even though EPA requested that the signal word be changed to CAUTION when it issued a conditional registration for this product (on February 2, 2007). The applicant must either change the signal word to CAUTION or provide its rationale for not changing it. Despite the fact that WARNING applies to a higher category, the label

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must accurately portray the efficacy of the product.

7. The accepted label claims that the product, Shield, is an effective disinfectant against Rotavirus on hard, non-porous surfaces. The Data Matrix identifies an efficacy study for Rotavirus, tested at a 1:32 dilution (and presumably a 5-minute contact time). The Data Matrix does not identify an efficacy study for Rotavirus, tested undiluted. You must update the Data Matrix to reflect this previously accepted claim.
8. You must remove the word "Attack" used on page 7 of the proposed label under the "General Claims" section.

Should you have any questions or comments concerning this letter, please contact Wanda Henson at (703) 308-6345.

Sincerely,

Emily Mitchell
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

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YMBOL							
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Note: **Bold, 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. Underlined text is new. Strike-through (~~text~~) means removed.

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Shield

ACCEPTED
with COMMENTS
EPA Letter Dated:
AUG 28 2007



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

67619-17

**KEEP OUT OF REACH OF CHILDREN
WARNING:**

EYE AND SKIN IRRITANT.

For Spray Product: USE ONLY IN WELL-VENTILATED AREAS.
See back label for additional precautionary statements.

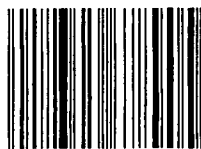
Active Ingredient: Sodium Hypochlorite 1.84%
Other Ingredients: 98.16%
Total: 100.00%

(Yields 1.75% available chlorine)
(17,480 PPM (Parts Per Million) Available Chlorine)

NET CONTENTS _____

Contains no phosphorus.

Clorox Customer Assistance 1-888-797-7225. Any Questions? The experts at Clorox are standing by to answer any of your questions. -or- Questions or Comments? Call [toll-free] 1-888-797-7225. Satisfaction Guaranteed[!] At Clorox we have prided ourselves in making consistent quality products [for over 75 -or- years], and we are dedicated to ensuring your total satisfaction with our product. If you are not completely satisfied, please call the number below -or- 1-888-797-7225. For MSDS information please go to www.cloroxprofessional.com



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Commercial Solutions is a registered trademark of Clorox Professional Products Company.
Clorox [and Clean-Up] is a -or- are registered trademark[s] of The Clorox Company. Made in the USA.
EPA Reg. No. 67619-17 EPA Est. No. 5813-GA-1, CA-3, OH-1, PR-1(actual code is shown above -or- below)
For dilutable PATENT USD 280,602. For Spray U.S.DES.PAT.265,887
Visit us at www.cloroxprofessional.com

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PRECAUTIONARY STATEMENTS: Hazards to Humans & Domestic Animals

WARNING: EYE AND SKIN IRRITANT. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Avoid contact with skin. Wear protective eyewear [such as goggles or safety glasses]. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Harmful if swallowed. For sensitive skin or prolonged use, wear gloves. Vapors may irritate. Avoid prolonged breathing of vapors. Use only in well ventilated areas. **[Not recommended for use by persons with heart conditions or chronic respiratory problems such as asthma, emphysema or obstructive lung disease.]** *(this statement will appear in color)*

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 eye. Call a poison control center or doctor for treatment advice. **IF ON SKIN OR CLOTHING:** 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 BREATHING IS AFFECTED:** 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. **IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glassful 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. Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS: This product contains bleach. Do not use or mix this product with other [household] chemicals such as ammonia, toilet bowl cleaners, rust removers, or acid, as this releases hazardous gases.

STORAGE AND DISPOSAL:

STORAGE: Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. [Do not contaminate food or feed by storage, disposal, or cleaning of equipment.]

DISPOSAL: Do not reuse empty container. Offer empty container for recycling. [Products or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer.] If recycling is not available, discard container in trash.

For containers larger than 1 gallon:

In case of spills, flood areas with large quantities of water.

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[Refill only with this product]**Alternate for Refill Bottle: To Refill [Spray Bottles]:**

- | Remove | Pour | Use | -or- |
|--|---|--|--|
| 1. Remove trigger sprayer
-or- cap from empty bottle. | 2. Unscrew cap on refill and pour
contents directly into empty bottle. | 3. Replace trigger sprayer and
use as you normally would. | [Remove trigger sprayer from empty bottle.]
unscrew cap and transfer your trigger to this bottle. |

DIRECTIONS FOR USE. It is a violation of Federal law to use this product in a manner inconsistent with its labeling.**For all products USE ONLY IN WELL-VENTILATED AREAS.**

Before use, open windows -and/or- turn on fan(s). If vapors bother you, leave room while product is working.

CLEANING, DEODORIZING, STAIN REMOVAL**[How] to clean -and/or- deodorize -and/or- remove stains:**

- **Full strength or diluted use:** Use full strength -or- mix 1/2 cup [(4 oz)] -or- 1 cup [(8 oz)] of this product in -or- with 1 gallon [warm] water. Apply directly with [damp] sponge -or- mop -or- cloth -or- rag. [Rinse or wipe clean.] [Allow to air dry.]
- **Floors:** Mop floor with 1 cup [(8 oz)] of this product mixed in 1 gallon of water. Rinse for best shine. [Avoid accidents. Floors and surfaces may be slippery when wet.]
- **Toilet bowls:** Flush toilet and add 3/4 cup [(6 oz)] of this product to bowl water. Brush thoroughly to wet all surfaces including under the rim. Let stand 5 minutes before flushing.

- **Spray application:** [Turn nozzle [counter]clockwise to open -or- Rotate nozzle to FOAM or SPRAY.] Spray [directly] onto surface. [Rinse or wipe clean.] [Allow to air dry.] -or- Spray 6-8 inches from the surface and allow product to penetrate tough stains and messes. Wipe with a wet sponge or cloth and rinse with water. No scrubbing required. For stronger jobs, use FOAM option. Spray and let product stand on surface for several minutes before wiping.

Claims (for cleaning, deodorizing, stain removal):

- Brightens
- Cleans and removes stains from washable floors
- Cleans everyday kitchen messes like dirt, grease and food stains
- Cleans tough messes
- Cuts through [tough] grease and grime
- Degreaser -or- Degreases
- Deodorizes
- Deodorizes and has a clean, fresh scent -or- fragrance
- Eliminates food odors like garlic and onion left behind in -or- on surfaces
- Eliminates odors caused by bacteria -or- germs -or- mildew
- Leaves [kitchen] [bathroom] surfaces [clean and] sanitary
- One step cleaner
- Removes food stains
- Removes odors

- Removes -and/or- cleans -and/or- bleaches [out] -and/or- cuts through -and/or- tough on [tough] stains
 - bathroom dirt -and/or- stains
 - bathtub ring
 - food -and/or- juice -and/or- coffee -and/or- tea
 - grime
 - hard water deposits
 - mineral deposits
 - soap scum
 - toilet ring
 - [tough] -and/or- [greasy] -and/or- [kitchen] dirt
- Removes stains on contact
- Removes tough stains -or- messes -or- greasy dirt
- Removes tough stains, fingerprints, bathroom soils, crayon marks, heel marks, pencil marks, grease and dirt
- Whitens
- Wipes out stains in kitchen and bath

Use Sites: See Table One**SANITIZATION****To [clean] [and] sanitize:**

- **Direct application -or- full strength use:** Directly apply [this product] with cloth -or- sponge -or- mop -or- rag and wet surfaces completely. Let stand 5 minutes. Rinse -or- wipe clean. [Allow to air dry.] For heavily soiled surfaces, preclean surface before sanitizing.
- or-
- **Diluted:** Mix 1/2 -or- 1 cup [this product] per gallon [warm] [hard -or- soft] water. Wet surface completely with cloth -or- sponge -or- mop -or- rag. Let stand 5 minutes. Rinse -or- wipe clean. [Allow to air dry.] For heavily soiled surfaces, preclean surface before sanitizing.

- or-
- **Spray application:** [Turn nozzle [counter]clockwise to open.] Spray product 4-6 inches from surface until thoroughly wet. Let stand 30 seconds. [Rinse -or- wipe clean.] [Allow to air dry.] For heavily soiled surfaces, preclean surface before sanitizing.

Organisms:

Staphylococcus aureus [(Staph)] [ATCC 6538], Klebsiella pneumoniae [ATCC 4352]

Claims:

- Leaves surfaces sanitized
- Sanitizes surfaces
- Pour down garbage disposal to sanitize and deodorize

Use Sites: See also Table One

Use [throughout the house] on hard, nonporous surfaces [such as]:

Bird Bath[s]
Dumpster[s]
Exhaust Fan[s]

Garbage Can[s]
Garbage Disposal[s]
Kennel[s]

Pet -or- Cat -or- Dog Area[s]
Pet -or- Cat -or- Dog Run[s]
[Picnic] Table[s]

Recycling Bin[s]
Trash Can[s]
Trash Compactor[s]

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DISINFECTION**To [clean and] disinfect [hard, nonporous surfaces]:**

• **Spray application:** [Turn nozzle [counter]clockwise to open -or- Rotate nozzle to FOAM or SPRAY.] Spray product 4-6 inches from surface until thoroughly wet. Let stand 30 seconds or longer if noted. [Rinse -or- wipe clean.] [Allow to air dry.] -or- Spray 6-8 inches from the surface and allow product to penetrate tough stains and messes. Let stand 30 seconds or longer if noted. Wipe with a wet sponge or cloth and rinse with water. No scrubbing required. For heavily soiled surfaces, preclean surface before disinfecting.

-or-

• **Direct application -or- full strength use:** Directly apply [this product] with cloth -or- sponge -or- mop -or- rag and wet surfaces completely. Let stand 5 minutes. [Rinse -or- wipe clean.] [Allow to air dry.] For heavily soiled surfaces, preclean surface before disinfecting.

-or-

• **Diluted -or- light use:** Mix 1/2 cup [(4 oz)] [of this product] per gallon [warm] [hard -or- soft] water. -or- **Floors:** Mix 1 cup [(8 oz)] [of this product] per gallon [warm] [hard -or- soft] water. Wet surface completely with cloth -or- sponge -or- mop -or- rag. Let stand 5 minutes. [Rinse -or- wipe clean.] [Allow to air dry.] For heavily soiled surfaces, preclean surface before disinfecting. [Avoid accidents. Floors and surfaces may be slippery when wet.]

-or-

• **For toilet bowls:** Flush toilet and add 3/4 cup [(6 oz)] [of this product] to bowl water. Brush thoroughly to wet all surfaces including under the rim. Let stand 5 minutes before flushing.

-or-

• **Food Contact Surfaces:** A potable water rinse is required after disinfection.

Organisms:

[Kills] [99.9% of common household] germs on hard, nonporous surfaces:

Bacteria:

**Acinetobacter baumannii* [ATCC 15308]*
**Clostridium difficile* [(Vegetative Form§)] [ATCC 9689]
Escherichia coli [(*E. coli* 0157:H7)] [ATCC 35150]
Listeria monocytogenes [(*Listeria*)] [ATCC 19117]
Methicillin resistant *Staphylococcus aureus* [(MRSA)] [ATCC 33519]
Pseudomonas aeruginosa [(*Pseudomonas*)] [ATCC 15442]
Salmonella choleraesuis -or- *enterica* [(*Salmonella*)] [ATCC 10708]
Shigella dysenteriae [(*Shigella*)] [ATCC 13313]
Staphylococcus aureus [(*Staph*)] [ATCC 6538]
Streptococcus pneumoniae [(*Strep*)] [ATCC 6305]
Streptococcus pyogenes [(*Strep*)] [ATCC 12344]
Vancomycin resistant *Enterococcus faecalis* [(VRE)] [ATCC 51299]

* Killing the vegetative cells can help reduce the bioburden of *Clostridium difficile* on environmental surfaces

Viruses Non-enveloped:

Adenovirus [type 2] [ATCC VR-846]
[(Strain Adenoid 6)] [(common cause of respiratory infections)]
Coxsackievirus [B3] [(Coxsackie)] [ATCC VR30]
[Human] Hepatitis A [Virus] [(HAV)] [NAV-1]
*Norovirus -or- Norwalk virus [(as Feline Calicivirus)] [ATCC VR-782]
*Poliovirus [type 1] [(Chat Strain)] [ATCC VR-1562]
Rotavirus [(Strain WA)] [(associated with viral diarrhea)].

Viruses Enveloped:

Avian Influenza A [ATCC VR-2072]
**HIV type 1 [III_{RF} strain]
[Human] Hepatitis B [Virus] [(HBV)] [(as duck HBV)] [DHBV16]
*[(Human] Hepatitis C [Virus] [(HCV)] [(as Bovine viral diarrhea virus)] [ATCC VR1422]**
[Human] Influenza [(Influenza A2)] [(Hong Kong)] [ATCC VR544]
[Human] Parainfluenza virus [(Sendai)] [ATCC VR-907]
Rhinovirus [type 17] [ATCC VR1110]

Bloodborne Pathogens:

**HIV type 1 [III_{RF} strain]
[Human] Hepatitis B [Virus] [(HBV)] [(as duck HBV)] [DHBV16]
*[(Human] Hepatitis C [Virus] [(HCV)] [(as bovine viral diarrhea virus)] [ATCC VR-1422]**

Mold, Mildew, Fungi:

Aspergillus niger [(mildew)] [ATCC 16404]
***Trichophyton mentagrophytes* [(Athlete's Foot Fungus)] [CDC y-68+]

* 1 minute contact time for spray applications

** 2 minute contact time for spray applications

** Spray and undiluted applications only

Use Sites: See Table One

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DISINFECTING AGAINST AVIAN INFLUENZA A VIRUS**FARM PREMISE AND POULTRY HOUSE DISINFECTANT (INSTRUCTIONS):****[Directions For Use:]**

1. Remove all poultry or animals and feeds from premises, trucks, vehicles, coops, crates, and enclosures.
2. Remove all litter and manure or droppings from floors, walls and surfaces of barns, pens, stalls, chutes, and other facilities and fixtures occupied or traversed by animals or poultry.
3. Empty all troughs, racks, and other feeding and watering appliances.
4. Thoroughly clean all surfaces with soap or detergent and rinse with water.
5. Saturate all surfaces with the recommended disinfecting solution for a period of 5 minutes (direct application or dilute use) -or- 30 seconds (spray application).
6. Immerse all halters, ropes, and other types of equipment used in handling and restraining animals, as well as forks, shovels, and scrapers used for removing litter and manure.
7. Ventilate buildings, cars, boats, coops, and other closed spaces. Do not house livestock or poultry or employ equipment until treatment has been absorbed, set, or dried.
8. Thoroughly scrub all treated feed racks, mangers, troughs, automatic feeders, fountains, and waterers with soap or detergent, and rinse with potable water before reuse.

Organism:

Avian Influenza A virus [Avian Flu] [VR 2072]

Specific instructions for use of all (spray and dilutable) This Product protects against (HIV-1), (HBV) and (HCV):**To kill HIV-1, HBV and HCV:**

This product kills HIV-1, HBV and HCV on precleaned environmental surfaces/objects previously soiled with blood/body fluids in health care settings (e.g. hospitals, nursing homes) 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), Human Hepatitis B Virus (HBV) and Human Hepatitis C Virus (HCV).

Special instructions for using this product to clean and decontaminate against HIV-1, HBV and HCV 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.

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.

Contact time: Dilute product 1:32. Spray -or- flood surface. Let stand 5 minutes. [Rinse -or- wipe clean.] [Allow to air dry.]

For spray product: Wet surface and let stand 2 minutes. [Allow to air dry.]

The following is only for products with medical devices listed on label [located by cautionary text]:

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced either 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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ALLERGEN DESTRUCTION OF DUST MITE AND COCKROACH MATTER/PARTICLES AND PET DANDER

To [clean and] destroy specified allergens:

- **Full strength:** Apply undiluted product directly to sponge -or- cloth -or- rag -or- mop. Wet surface completely. Let stand 5 minutes. [Rinse or wipe clean.] [Allow to air dry.]

- **Spray application:** [Turn nozzle [counter]clockwise to open -or- Rotate nozzle to FOAM or SPRAY.] Spray product 4-6 inches from surface until thoroughly wet. Let stand 3 minutes. [Rinse -or- wipe clean.] [Allow to air dry.]

Allergens:

- Dust mite matter -or- particles
- Cockroach matter -or- particles

- Pet dander

Claims:

- [Breaks down] [Deactivates] [Destroys] [Penetrates] [Reduces] dust mite matter -or- particles, cockroach matter -or- particles, and pet dander allergens found in dust
- [Breaks down] [Deactivates] [Destroys] [Penetrates] [Reduces] [household] dust mite matter -or- particles, cockroach matter -or- particles, and pet dander allergens

- This product cleans, destroys dust mite matter -or- particles, cockroach matter -or- particles, pet dander while cleaning hard, nonporous surfaces such as sinks, counters, refrigerators, appliances, fiberglass and tubs

Use Sites: See Table One

FUNGI AND MOLD AND MILDEW

To [clean and] kill fungi -and/or- mold -and/or- mildew on [hard,]

[nonporous] surfaces:

- **Full strength:** Apply product directly to surface -or- with cloth -or- sponge -or- mop -or- rag and wet surfaces completely. Let stand 5 minutes. [Rinse -or- wipe clean.] [Allow to air dry.] For heavily soiled surfaces, preclean surface before disinfecting.

-or-

- **Spray application:** [Turn nozzle [counter]clockwise to open -or- Rotate nozzle to FOAM or SPRAY.] Spray product 4-6 inches from surface until thoroughly wet. Let stand 5 minutes. [Rinse -or- wipe clean.] [Allow to air dry.] For heavily soiled surfaces, preclean surface before disinfecting.

Claims:

- Kills mold and mildew
- Kills Athlete's Foot Fungus
- Mildewcidal -or- Mildewcide
- Fungicidal -or- Fungicide

- Removes -and/or- cleans -and/or- bleaches out -and/or- cuts through -and/or- tough on mold -and/or- mildew
- Removes -and/or- bleaches out mold and mildew stains
- Antifungal

Organisms:

Trichophyton mentagrophytes (Athlete's Foot Fungus) [CDC y-68+], Aspergillus niger (mildew) [ATCC 6275]

Use Sites: See Table One

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GENERAL CLAIMS

- Bleach for kitchen and bath
- Citrus Blend
- [Citrus] [fresh] [floral] [pleasant] scent -or- fragrance
- [Citrus] [Fresh] [Natural] Breeze
- Citrus Zest
- Cleans [dirty floors] greasy counter[top]s
- Contains sodium hypochlorite plus a cleaner
- [Easily] removes -or- cleans tough bathroom -and/or- restroom -and/or- kitchen -and/or- household -and/or- office -and/or- workplace [dirt] [soils] [grime] [soap scum] [!]
- For a cleaner -and/or- fresher [bathroom] [restroom] [kitchen] [home] [house] [place] [work -or- office place] [work -or- office environment]
- Fresh Mist
- Freshens [the] [your] [bathroom] [restroom] [kitchen] [home] [house] [place] [work -or- office place] [work -or- office environment]
- [Has] [Leaves] a clean scent -or- fragrance
- Makes [cleaning] [your job] easier [in the kitchen -and/or- bathroom -and/or- house] [in the work -or- office place] [at work]
- Patented design bottle
- Pleasant fragrance
- Power of bleach [without the] [strong] smell]
- [Removes] [Eliminates] [Attacks] [Gets rid of] [Melts away] tough [soap scum] [[bathroom -and/or- restroom -and/or- kitchen -and/or- household -and/or- office -and/or- workplace] [dirt] [soils] [grime]] [!]
- The [convenient] [easy] [effective] way to keep your [home] [house] [bathroom] [kitchen] [common areas] [office] [work -or- office] [area] [place] [environment]] looking "just cleaned"
- The smell of clean
- Tough on grime -and/or- soap scum -and/or- dirt -and/or- [other] [tough] [bathroom -or- restroom] [kitchen] [household] [office] [work -or- office place] soils[!]
- Ultra Fresh

Environmental Claims:

- Contains biodegradable cleaning agents -and/or- cleaners -and/or- surfactants -and/or- soaps and detergents
- The bleach in this product breaks down almost entirely to salt and water -and/or- This bottle is made of ___% post-consumer recycled [HDPE] plastic -and/or- [This product is] suitable for septic [systems] -and/or- wastewater systems -or- treatment plants
- Not harmful to septic systems
- This product complies with consumer product volatile organic compound (VOC) laws

Specific for Industrial product:

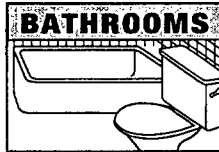
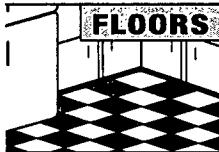
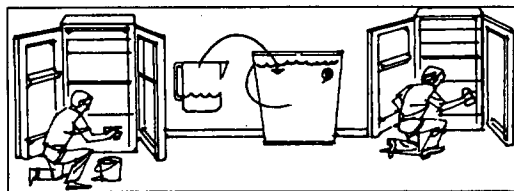
- Institutional Size
- Industrial Size
- Not for Household Use
- Warehouse [Club] Size
- Commercial Solutions

Specific for spray and refill packages:

- Accurate-aim trigger [option] [for better [bleach] control]
- All Purpose -or- Multi-Purpose -or- Multi-Use -or- Multi-Room -or- Multi-Surface [Spray] Cleaner [with bleach]
- Anti-foam -or- anti-suds nozzle
- [Bathroom] [Kitchen] Spray
- Better aim [for better [bleach] control]
- Bleach what you want to bleach and nothing more!
- Concentrated [foaming] spray action [for better [bleach] control]
- Controlled bleach spray
- Direct-[spray] [aim] trigger [option] [for better [bleach] control]
- Dual-control [nozzle] [trigger] [option for better [bleach] control] [spray and foaming option]
- Economy refill [size]
- Foam quickly cuts grease marks and tough stains
- Foaming [action] [spray] stays where you spray
- Foaming trigger [option] [for more accurate [bleach] application]
- Foaming [trigger] [spray] [nozzle] option [for better [bleach] control]
- Foaming, stays where you spray
- Foaming -or- sudsing nozzle
- Light effervescent foam clings to surfaces allowing you to see exactly where you applied it
- Low -or- no foam -or- suds nozzle
- Multi-[action] [control] [nozzle] [trigger] [option for better [bleach] control]
- Multi-[action] [control] [nozzle] [trigger] [spray and foaming option]
- Prevents [-or- reduces -or- eliminates] over-spray
- Spray Formula
- Sudsing -or- foaming action
- Targeted [foaming] spray action [for better [bleach] control]

Specific for non-spray products (i.e., dilutable, industrial and warehouse packages):

- Concentrate -or- Concentrated Formula



11/12

Note: **Bold, 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. Underlined text is new. Strike-through (~~text~~) means removed.

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DISINFECTION CLAIMS**Claims**

- A bleach product for household [-and/or- institutional -and/or- industrial] cleaning and disinfecting
- [America's] Home -or- household disinfectant -and/or- cleaner
- Anti-bacterial [action]
- Anti-bacterial cleaner
- Bacteria-fighting -or- Germ-fighting formula
- Bactericide -or- Bactericidal
- Bathroom -or- restroom disinfectant
- Bleach disinfectant [-and/or- cleaner]
- Broad spectrum disinfectant -or- disinfectancy [cleaner]
- Clean. Disinfect. Protect.
- Cleaner and disinfectant in one
- Cleans -and/or- disinfects [bathroom] [school] [classroom] [restroom] [kitchen] [home] [household] [office] [work -or- office] [place] [environment]] [place]
- Disinfecting bleach cleaner
- Disinfects
- Disinfects [inside -and/or- outside of] appliances
- Disinfects and cleans your home
- Disinfects and deodorizes by killing common household germs and controlling their odors
- Disinfects as it cleans
- Disinfects for pennies
- Disinfects nonporous [hard] [solid] surfaces
- Easily [cleans] [deodorizes] [sanitizes] [disinfects]
- [Easy] [convenient] way to disinfect
- [Effective] [bathroom -and/or- restroom -and/or- kitchen -and/or- household -and/or- office -and/or- workplace] disinfectant -and/or- cleaner
- [Effective] disinfectant [in presence of 5% serum load -or- organic soil]
- Fast acting disinfectant [cleaner]
- Germicide -or- Germicidal
- Hospital and home disinfectant
- Hospital, institutional disinfectant
- Kills cold and flu virus
- Kills germs while it cleans
- Kills -or- eliminates -or- destroys [99.9%] [cold virus] [flu virus]
- Kills -or- eliminates -or- destroys [99.9%] [E. coli] [Salmonella] [harmful kitchen germs -or- bacteria]
- Kills -or- eliminates -or- destroys [99.9%] of viruses that cause cold -or- flu
- Kitchen disinfectant
- One step cleaner and disinfectant
- Removes stains and disinfects
- Salmonella choleraesuis -or- enterica [(Salmonella)] and Staphylococcus aureus [(Staph)] are common germs found where food is prepared and stored. This product kills these harmful germs and helps control the hazard/spread of food-borne contamination on all hard kitchen surfaces
- This [cleaner] [disinfectant] combines cleaning and disinfecting [in one product] [in one step]
- [This product] has the cleaning power -and/or- effectiveness of Clorox® to clean and disinfect
- This product is a cleaner disinfectant which combines cleaning, disinfecting and stain removal in one product
- [This product] The power of Clorox® to clean [tough] [bathroom -and/or- restroom -and/or- school -and/or- classroom -and/or- kitchen -and/or- household -and/or- office -and/or- workplace] [grime] [dirt] [soils] and kill bathroom germs -and/or- bacteria
- Virucide -or- Virucidal*
- **For spray:** Kills 99.9% of [common] household germs [bacteria -and/or- viruses] in 30 seconds

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12/12/1

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TABLE ONE**USE LOCATIONS:** [Where to use this product] [For use around -or- in -or- throughout the]

Airplane -or- Plane [Lavatory -or- Lavatories]	Children's -or- Child's -or- Kid's [Play] Room	Fitness Center	Medical -or- Dental -or- Physician's -or- Doctor's	Pharmacy
Ambulance	Church	Garage	-or- Nurse's -or- Pediatrician's [Office[s]]	Plant
Automobile -or- Car	Common [Classroom] [School] [Play] Areas	Grocery Store	[Waiting Room[s]]	Playground Equipment
Basement	Day Care Center	Gymnasium	[Exam[ination] Room[s]]	Recreational Center
Bathroom	[Dental -or- Medical] Office	Health Club	-or- Table[s]]	-or- Facility
Bedroom	[Dentist's -or- Doctor's -or- Physician's] Office	Hospital	[Medical] Clinic	Restaurant
Blood Bank	Dining Room	Hotel	Military Installation	RV
Boat	Dormitory	House[boat]	Mobile Home	School
Bowling Alley	Elder Care Centers	Industrial Facility	Motel	[School -or- City -or- Public Transit -or- Commuter] Bus
Business	[Elementary] School -or- College -or- University	Institutional Kitchen	Motor -or- House Boat	Shelter
Butcher Shop	Factory -or- Plant	Jungle Gym[s]	Nursery	Supermarket
Cafeteria	Family Room	Kitchen	Nursing Home -or- Convalescent Home -or- Senior [Citizen's] Home	Trailer
Camper -or- RV -or- Trailer		Laboratory	Office	Train Interior
-or- Mobile Home		Laundromat	Patio -or- Porch	Vehicle [Interior] [Exterior[s]]
Campground		Laundry Room		Veterinary Clinic
		Locker Rooms		

USE SITES: [Use] On [hard,] [nonporous surfaces]

[Baby] -and/or- [Children's] Toy[s]	[Classroom] Desks	[High] Chair[s]	Paper Towel [Dispensers] [Holders]	[School] [Toys] [Supplies]
Baby Furniture [Cribs, Changing Tables]	Countertop[s]	[Inside -and/or- Outside of] Appliances [such as] [Refrigerators, Microwaves, Freezers]	Patient Chair[s]	Shower Curtain[s]
[Basement] [Washable] Walls	Desk[s]	[Inside and/or Outside] Toilet[s]	Picnic Tables [nonporous]	Shower [stalls]
[Bath] Tub[s]	Diaper Changing Table[s]	[Kitchen] Counter[s]	[Plastic] Cutting Boards	Sink[s]
[Bathroom] [Kitchen] Windowsills	Diaper Pail[s]	Lamp[s]	Plastic Mattress Cover[s]	Table Top[s]
Bed Frame[s]	[Dining -or- Kitchen -or- Play] Table	Light Switch	Porta-Potty -or- Portable Bathroom	Telephone[s]
Bidet[s]	Dish Pail[s]	[Manual] Pencil Sharpener	Range Hoods	Urinal[s]
Blinds	Dish Rack[s]	Many Crib Surface[s]	Refrigerator Door	Wading Pool[s]
Cabinets	Door Knob[s]	Outdoor Furniture [except cushions and wood frames]	Restaurant High Chairs	[Water] [Drinking] Fountain [Toggle]
Cat -and/or- Dog -and/or- Pet Dish[es] -or- Soiled Surface[s]	Examination Table[s]	Ovens [Exteriors]	[Salad Bar] [Buffet] [Cafeteria] Sneeze Guard[s]	Wheelchair[s]
	Floors [No Wax -and/or- Washable]			
	Food Serving Area[s]			
	Hand Dryer Buttons			

USE SURFACES:

Chrome	Formica	Laminated Surface[s]	Plastic	Sealed Granite
Corian	Glazed [Ceramic] Tile	Linoleum	Plastic Laminate	Stainless Steel
Enamel	Glazed Porcelain	Marlite	Porcelain	Synthetic -or- Cultured Marble
Fiberglass [[bath]tubs] - and/or- [sinks]	Laminate	Metal	Resilient Flooring	Vinyl Tile

• Prolonged contact with metal, old porcelain or worn plastic laminate may cause discoloration

• [Avoid contact with clothes, fabric, wood, rubber, painted and paper surfaces. Do not use on steel, aluminum, silver, or chipped enamel.
APPLY CAREFULLY - This product contains bleach.]

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