

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

AUG 2 5 2010

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Elisa Estremera-Pasky Regulatory Scientist Clorox Professional Products Company c/o PS&RC P.O. Box 493 Pleasanton, CA 94566-0803

FILE COPY

Subject:

Shield

EPA Reg. No. 67619-17

Application Dated: June 1, 2010 Receipt Date: June 2, 2010

Dear Ms. Estremera-Pasky:

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

### **Proposed Amendment:**

Label Amendment

#### **Conditions:**

Revise the label as follows:

- 1. On Page 2, revise the Storage and Disposal Statements by adding the appropriate residue removal statements per PR Notice 2007-4 based on the product's container type and formulation type.
- 2. On page 9, delete the Exposure Reduction Claims section. The term exposure relates to what happens to chemicals when they are used and released to the environment; and how workers, the general public, consumers and the aquatic ecosystems may be exposed to chemicals. The proposed exposure reduction claim is not acceptable as it relates to exposure to a specific organism and, therefore, doesn't fit within the definition of exposure.

#### **General Comments**

A stamped copy of the accepted labeling is enclosed. Submit 1 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 me at <a href="mailto:Henson.Wanda@epa.gov">Henson.Wanda@epa.gov</a> or call (703) 308-6345.

Sincerely,

Wanda Henson

Acting Product Manager (32)

Regulatory Management Branch II

Antimicrobials Division (7510P)

# Shield

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 2 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 676 19–17



Active Ingredient:

Sodium Hypochlorite . . . . . 1.84% Other Ingredients: . . . . . . 98.16%

[(Yields 1.75% available chlorine)]

(17,480 PPM (Parts Per Million) Available Chlorine)

**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.

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



Mfd. for & © 2007 Clorox Professional Products Company, 1221 Broadway, Oakland, CA 94612. 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, -4, -5, MD-2, PR-1, 46813-CAN-6, 71681-GA-1, 82224-MI-1, -M1-2, MI-3 (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

#### 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. I (this statement will appear in color)

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.

Professional/Institutional uses (32 fl oz RTU Spray)

(Refillable bottles intended to be refilled by the consumer)

#### STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. Do not reuse or refill except as described in the directions for use. Refill only with this product. [Please] recycle empty container or discard in trash.

Professional/Institutional uses (32 fl oz RTU Spray)

(Bottle's not intended to be refilled by the consumer)

#### STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. Nonrefillable container. Do not reuse or refill container. [Please] recycle empty container or discard in trash.

Professional/Institutional uses (64 fl oz. 128 fl oz Direct application/dilutable non-spray) (Nonrefillable bottles)

#### STORAGE AND DISPOSAL:

Store this product in a cool [dry] area, [away from direct sunlight and heat] to avoid deterioration. In case of spill, flood areas with large quantities of water. Product or rinsates that cannot be used should be diluted with water before disposal in a sanitary sewer. Nonrefillable container. Do not reuse empty container. [Triple rinse promptly, then] [please] recycle empty container or discard in trash.

#### Packaging Related Statements and Icons:

[Padlock icon unlocked and locked (on bottle shrink) with corresponding arrow (molded into trigger)



To refill: Turn trigger on spray bottle [1/8th turn] counterclockwise [and pull upwards] to remove. [After refilling spray bottle,] Replace trigger by aligning tube on trigger with [opening] [tube] inside bottle and turn clockwise [while pushing down] [-and/or- push [sprayer] straight down [until it clicks] [-and/or- locks into place]].

- When almost empty, -or- To spray every drop, tilt bottle downward -or- at a downward angle [while spraying].
- [To foam (close screen on nozzle) or spray (open screen on nozzle)].

ACCEPTED with COMMENTS in EPA Letter Dated: AUG 2 5 2010

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#### Packaging Related Statements and Icons: Continued

[Refill only with this product]
Alternate for Refill Bottle:

[Remove]

1. Remove trigger sprayer -or- cap [from empty bottle]

To Refill [Spray Bottles]: [P

2. Unscrew cap on refill and pour contents directly into empty bottle.

[Use]

3. Replace trigger sprayer [and use as you normally would].

-or-

[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

Use Sites: See Table One

- 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
  - arime
  - 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

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 67619-17

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.

• Diluted: Mix 1/2 -or- 1 cup (this product) per gallon [warm] [soft] water. Wet surface completely with cloth -or- sponge -or- mop -orrag. Let stand 5 minutes. Rinse -or- wipe clean. [Allow to air dry.] For heavily soiled surfaces, preclean surface before sanitizing.

-or-

**SANITIZATION** 

• 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.

Pour down garbage disposal to sanitize and deodorize

Organisms:

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

Leaves surfaces sanitized

Sanitizes surfaces

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]

#### 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 disinfectina.

-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.

- Diluted -or- light use: Mix 1/2 cup [(4 oz)] [of this product] per gallon [warm] [soft] water. -or- Floors: Mix 1 cup [(8 oz)] [of this product] per gallon [warm] [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.]
- 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.
- Food Contact Surfaces: A potable water rinse is required after disinfection.

ACCEPTED with COMMENTS in EPA Letter Dated: AUG 2 5 2010

Under the Federal insectionle, Respective and Radionards Act as amended, for the positivity registered under EPA Reg. No. 67619-11

#### DISINFECTION Continued

#### Pandemic 2009 H1N1 Influenza A virus\*\*\*

#### Claims:

- Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. This product (Product Name) is a broad-spectrum hard surface disinfectant that has been shown to be effective against influenza A2 virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).
- This product has demonstrated effectiveness against influenza A2 virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.
- This product has demonstrated effectiveness against influenza A2 virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).
- Kills Pandemic 2009 H1N1 influenza A virus (formerly called swine flu).
- Kills Pandemic 2009 H1N1 influenza A virus.

per Agency quidance dated October 22, 2009 "Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1 Influenza A Virus (formerly called Swine Flu)" www.epa.gov/oppad001/h1n1-quide.html

- Kills [2009] H1N1 [Flu Virus]
- Kills Germs -and/or- Flu Viruses (including [2009] H1N1]
- Kills [99.9% of] Germs including [2009] H1N1 [Flu Virus]
- Effective against [2009] H1N1 [Flu Virus]

#### Organisms:

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

#### Bacteria:

Acinetobacter baumannii [ATCC 15308]\*

Community Associated Methicillin resistant Staphylococcus aureus [CA-MRSA] [NARSA NRS123] [Genotype USA 400]\*

Community Associated Methicillin resistant Staphylococcus aureus [CA-MRSA] [NARSA NRS384] [Genotype USA 300]\*

ESBL (Extended Spectrum Beta Lactamase) producing Escherichia coli (ESBL producing E. coli) [ATCC BAA-196]\*

Escherichia coli [(E. coli 0157:H7)] [ATCC 35150]\*

Listeria monocytogenes [(Listeria)] [ATCC 19117]\*

Methicillin resistant Staphylococcus aureus [(MRSA)]

[ATCC 33591]\*

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 19615]\*

Vancomycin resistant Enterococcus faecalis [(VRE)] [ATCC 51299]\*

#### Viruses Non-enveloped:

Use Sites: See Table One

Adenovirus [type 2] [ATCC VR-846]\* [(Strain Adenoid 6)]

[(common cause of respiratory infections)]

Coxsackievirus [B3] [(Coxsackie)] [ATCC VR-30] [Strain Nancy]\*

Rotavirus [(Strain WA)] [(associated with viral diarrhea)]\*

[Human] Hepatitis A [Virus] [(HAV)] [HAV-1]\* Norovirus -or- Norwalk virus [(as Feline Calicivirus)] [ATCC VR-782]† Poliovirus type 1 [(Chat Strain)] [ATCC VR-1562]†

#### Viruses Enveloped:

Avian Influenza A [ATCC VR-2072, Strain A/Washington/897/80 X A/ Mallard/New York/6750/78]\*, -or- Turkey/Wis/66 (H9N2), SPAFAS)±

HIV type 1 [RF strain] † †

[Human] Hepatitis B [Virus] [(HBV)] [(as duck HBV)] [DHBV16]\*

[Human] Hepatitis C [Virus] [(HCV)] [(as Bovine viral diarrhea

virus)] [ATCC VR1422]\*1

[Human] Influenza [(Influenza A2)] [(Hong Kong)] [ATCC VR-544]\* [Human] Parainfluenza 1 virus [(Sendai)] [ATCC VR-907]\*

Rhinovirus [ATCC VR-1110]\*

#### Bloodborne Pathogens:

HIV type 1 [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 6275]††† Trichophyton mentagrophytes [(Athlete's Foot Fungus)] [CDC y-68+]\*\*†††

- 1 min[ute] contact time for spray applications
- †† 2 min[ute] contact time for spray applications
- 30 seclonds contact time for spray applications
- ††† 5 min[ute] contact time for spray applications
- Spray and undiluted applications only

ACCEPTED IIIs Avian Influenza A on precleaned environmental surfaces.

with COMMENTS in EPA Letter Dated:

AUG 2 5 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 676/9-17

#### DISINFECTING AGAINST AVIAN INFLUENZA A VIRUS

#### FARM PREMISE AND POULTRY HOUSE DISINFECTANT [INSTRUCTIONS]:

(Directions For Use:)

- 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.
- 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).

- 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 [ATCC VR-2072], -or- Turkey/Wis/66 (H9N2), SPAFAS) [Strain A/Washington/897/80 X A/Mallard/New York/6750/78]\*‡

‡ Kills Avian Influenza A on precleaned environmental surfaces.

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.

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 25 2010

Under the Federal Insecticide,
Fungicide, and Redenticide Act as
comended for the pesticide,
remittered under EPA Reg. No. 676/9-//

EPA Reg. No. 67619-17 Shield Pag

#### 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 drv.]

#### Allergens:

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

· Pet dander

#### Claims:

- [Break's down] [Deactivates] [Destroys] [Penetrates] [Reduces] dust mite matter -or- particles, cockroach matter -or- particles, and pet dander allergens found in dust
- [Break's down] [Deactivates] [Destroys] [Penetrates] [Reduces] shousehold dust mite matter -or- particles, cockroach matter -orparticles, 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 -orsponge -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.

• 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

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 25 min

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 67619-17

#### **GENERAL CLAIMS**

New [and -or- & Improved][!] to be used as a claim descriptor only for the first 6 months of product on shelf.

- · 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/orworkplace [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/orbathroom -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] [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]
- The [convenient] [easy] [effective] way to keep your [home] [house] [bathroom] [kitchen] [common areas] [office] [work -oroffice [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:

- [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:

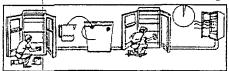
- Institutional Size
- Industrial Size
- . Not for Household Use
- · Warehouse [Club] Size
- Commercial Solutions

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registered under EPA Reg. No.















#### 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]
- · All-Spray -or- Easy Spray -or-Empt-Ease -or- Reliaspray -or-Spray-All [Bottle] [Technology]
- · 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]
- Easy Drop Delivery
- · 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
- Get -or- Spray Every Drop[!]
- Last Drop Access
- 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] controll
- · Multi-[action] [control] [nozzle] [trigger] [spray and foaming option]
- · No Waste -or-Wasteless Bottle
- · Prevents [-or- reduces -or- eliminates] over-spray
- Smart Tube(®) [™] Technology
- 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

#### DISINFECTION CLAIMS

#### Claims

- A bleach product for household [-and/or- institutional -and/or-industrial] cleaning and disinfecting
- Anti-bacterial [action]
- Anti-b\u00e4cterial 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/orhousehold -and/or- office -and/or- workplace] disinfectant -and/ or- cleaner
- [Effective] disinfectant [in presence of 5% serum load -or- organic soil]
- 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 treated surfaces in kitchens
- 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]

#### Exposure Reduction Claims:

Reduces exposure to Methicillin resistant Staphylococcus aureus [(MRSA)] from treated surfaces.

ACCEPTED with COMMENTS in EPA Letter Dated:
AUG 2 5 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 6 76/9-17

#### TABLE ONE

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

- Airplane -or- Plane [Lavatory -or- Lavatories 1
- Ambulance
- Automobile -or- Car
- Basement
- Bathroom
- Bedroom
- Blood Bank
- Boat
- Bowling Alley
- Business
- Butcher Shop

#### Cafeteria

- Camper -or- RV -or- Trailer -or- Mobile Home
- Campground
- . Children's -or- Child's -or-Kid's [Play] Room
- Church
- Common [Classroom] [School] [Play] Areas
- Dav Care Center

- . [Dental -or- Medical] Office
- . [Dentist's -or- Doctor's -or Physician's 1 Office
- . Dining Room
- Dormitory
- · Elder Care Centers
- [Elementary] School -or-College -or- University
- · Factory -or- Plant
- · Family Room
- Fitness Center
- Garage
- · Grocery Store
- Gymnasium
- · Health Club
- Hospital
- Hotel
- House[boat]
- Industrial Facility
- Institutional Kitchen
- Jungle Gym[s]

- Kitchen
- Laboratory
- · Laundromat
- · Laundry Room
- · Living Room
- Locker Rooms
- . Medical -or- Dental -or-Physician's -or- Doctor's -or-Nurse's -or- Pediatrician's [Office[s]] [Waiting Room[s]] Exam[ination] Room[s] -or-Table[s]]
- [Medical] Clinic
- Military Installation
- · Mobile Home
- Motel
- · Motor -or- House Boat
- Nursery
- · Nursing Home -or-Convalescent Home -or-Senior [Citizen's] Home
- Office

- · Patio -or- Porch
- Pharmacv
- Plant
- · Playground Equipment
- · Recreational Center -or-Facility
- Restaurant
- •: RV
- School
- . ISchool -or- City -or- Public Transit -or- Commuter] Bus
- Shelter
- Supermarket
- Trailer
- Train Interior
- Vehicle [Interior] [Exterior[s]]
- Veterinary Clinic

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 2 5 2010

Under the Federal insecticide, Fungicide, and Rodeniardo Act as amended, for the pesticide, registered under EPA Reg. No. 676/9-1

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

- [Baby] -and/or- [Children's] Toyisi
- . Baby Furniture (Cribs, Changing Tables)
- [Basement] [Washable] Walls
- [Bath] Tub[s]
- [Bathroom] [Kitchen] Windowsills
- Bed Frame(s)
- Bidet[s]
- Blinds
- Cabinets
- Cat -and/or- Dog -and/ or- Pet Dish[es] -or- Soiled Surface[s]
- [Classroom] Desks
- Countertop[s]

- Desk[s]
- . Diaper Changing Table[s]
- Diaper Pail[s]
- [Dining -or- Kitchen -or-Play] Table
- Dish Pail(s)
- Dish Rack[s]
- Door Knob[s]
- Examination Table[s]
- · Floors [No Wax -and/or-Washable1
- · Food Serving Area[s]
- · Hand Dryer Buttons
- [High] Chair[s]
- [Inside -and/or- Outside of Appliances [such as] [Refrigerators, Microwaves, Freezers1

- [Inside and/or Outside] Toilet[s]
- [Kitchen] Counter[s]
- Lamp(s)
- · Light Switch
- · [Manual] Pencil Sharpener
- Many Crib Surface[s]
- Outdoor Furniture [except cushions and wood frames]
- · Ovens [Exteriors]
- · Paper Towel [Dispensers] [Holders]
- Patient Chair[s]
- Picnic Tables [nonporous]
- . [Plastic] Cutting Boards
- Plastic Mattress Cover[s]
- · Porta-Potty -or- Portable Bathroom

- · Range Hoods
- ·: Refrigerator Door
- · Restaurant High Chairs
- [Salad Bar] [Buffet] [Cafeteria] Sneeze Guard[s]
- [School] [Toys] [Supplies]
- Shower Curtain[s]
- Shower [stalls]
- Sink[s]
- Table Top[s]
- Telephone[s]
- Urinal(s)
- Wading Pool[s]
- [Water] [Drinking] Fountain [Toggle]
- Wheelchair[s]

#### TABLE ONE continued

#### USE SURFACES:

• Chrome

· Glazed Porcelain

Metal

· Sealed Granite

• Corian

Laminate

Plastic

· Stainless Steel

• Enamel

· Laminated Surface[s]

· Plastic Laminate

Formica

· Synthetic -or- Cultured Marble

• Linoleum

· Resilient Flooring

• Glazed [Ceramic] Tile

Marlite

· Sealed Fiberglass [[bath] tubs] -and/or- [sinks]

Vinvl 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.]

> ACCEPTED with COMMENTS in EPA Letter Dated:

> > AUG 2 5 2010

Under the Federal Insecticide, -Let u, for the posticide, 4 76 19-17