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



SEPA United Status Environmental Protection Office of Pesticide Programs Agency

December 22, 2008

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



Subject:

WD-40 Company

X-14 Mildew Stain Remover EPA Registration No. 71903-1 Application Date: August 29, 2008 Receipt Date: August 29, 2008

Dear Ms. Anastasiou:

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

Conditions

1. Revise the ingredient statement as follows:

ACTIVE INGREDIENT:

Sodium Hypochlorite 4.00% OTHER INGREDIENTS: 96.00%

Available Chlorine X%

2. The proposed label is accepted for claims that this product is an effective disinfectant on hard, non-porous surfaces against Aspergillus niger for a 5 minute contact time.

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- 3. The following statements have been removed from the label:
 - "mildew won't get to see it's spores grow up"
 - "mold won't get to see it's spores grow up"
 - "proven to remove mildew faster and more completely than competitors"
 - "proven to remove mildew faster and more completely than the competition"
 - "works on contact"
 - "works instantly"
 - "Expert" from claims on front panel

General Comments

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

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

Sincerely,

Emily H. Mitchell

Product Manager - Team 32

Regulatory Management Branch II Antimicrobials Division (7510P)

X-14[®] Mildew Stain Remover X-14[®] Professional Mildew Stain Remover X-14® Professional Instant Mildew Stain Remover X-14[®] Mildewcide X-14® Mildew Remover X-14® Multipurpose Mold and Mildew Remover X-14® Mold & Mildew Remover X-14® Mold & Mildew Remover with Bleach X-14® Mold & Mildew Remover and Disinfectant X-14® Mold & Mildew Remover and Disinfectant with Bleach X-14® Disinfectant Mold & Mildew Remover X-14® Disinfectant Mold & Mildew Remover with Bleach X-14® Antibacterial Mold & Mildew Remover X-14® Antibacterial Mold & Mildew Remover with Bleach X-14® The Bathroom Antibacterial Mold & Mildew Remover X-14® The Bathroom Antibacterial Mold & Mildew Remover with Bleach X-14® The Bathroom Mold & Mildew Remover X-14® The Bathroom Mold & Mildew Remover with Bleach X-14[®] The Bathroom Tribular Disinfectant Mold & Mildew Remover X-14® The Bathroom Disinfectant Mold & Mildew Remover with Bleach

Fast-No Scrubbing--Removes Tough Mold & Mildew Stains Without Scrubbing--Sprays Mildew Stains Away--Controls Mildew--Kills Staphylococcus aureus--Kills Athlete's Foot Fungus on Environmental Surfaces—Kills Aspergillus niger -- Kills Influenza A2 (Japan) on Hard, Non-Porous Surfaces--Kills Herpes Simplex Type 1 and Type 2 on Hard, Non-Porous Surfaces--Kills Most Germs--Kills Most Germs and Mildew--Kills Odor-Causing Germs--Antibacterial--Deodorizes—Disinfects-Disinfects Against Odor-Causing Germs As It Kills Mildew

Disinfectant Kills 99.9% of Germs

Active Ingredient:	
Sodium Hypochlorite	4.00%
Other Ingredients:	96.00%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN WARNING

See additional precautions on back panel

EPA Reg. No. 71903-1 EPA Est. No. 71903-TN-001 5741-OH-001

Net Contents:

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Under the Faderal Insectioide, dads, und kodeniciós fictes en raind ist the pe**etside.** the result ander SPA Reg. No. 91903-1

- Removes [tough] soap scum
- Removes problem [mold,] mildew and soap scum
- Leaves a brilliant shine
- Cleans to a shine
- Shines [hard surfaces]
- Watch stains disappear
- Antibacterial
- Disinfectant
- Disinfecting
- Disinfects [as it cleans]
- Disinfects against odor causing germs [as it kills mold and mildew]
- Cleans and disinfects [as it kills mold and mildew]
- Kills odor-causing germs
- Kills 99.9% of germs [and bacteria]
- Kills 99.9% of bacteria
- · Kills mold & mildew and 99.9% of germs [and bacteria[
- Kills mold & mildew and disinfects
- Kills mold and mildew and disinfects, killing 99.9% of germs [and bacteria]
- · Kills Staphylococous aureus
- Kills Athlete's Foot Fungus on environmental surfaces
- Kills viruses*
- Kills* Influenza A2 (Japan) on hard, non-porous surfaces
- Kills *Herpes Simplex Type 1 and Type 2 on hard, non-porous surfaces
- Disinfects and kills Mold & Mildew on hard, non-porous surfaces, such as glazed bathroom tiles, fiberglass sinks, plastic and vinyl.

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- · Keeps mold and mildew away for up to four weeks
- Keeps mold away for up to four weeks
- Keeps mildew away for up to four weeks
- Removes mold and mildew with no scrubbing
- Removes mold with no scrubbing
- Removes mildew with no scrubbing
- Kills mold and mildew without scrubbing
- Kills mold without scrubbing
- Kills mildew without scrubbing
- · Removes mold and mildew on sealed grout
- · Removes mildew on sealed grout
- Removes mold on sealed grout
- Watch stains disappear
- Watch mold and mildew disappear
- Watch mold disappear
- · Watch mildew disappear
- Power of bleach
- Attacks mold and mildew
- Get mildew to go away

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Let stand five minutes and wipe. This product kills *Staphylococcus aureus*, athlete's foot fungus and viruses (Influenza A2 (Japan), Herpes Simplex Type 1 and Type 2).

STORAGE AND DISPOSAL

[Turn nozzle to "off" position for storage]. [Reclose sprayer tip for storage]. Non-refillable container. Do not reuse or refill this container. Rinse thoroughly before discarding in trash or offer for recycling, if available.

AVOID PROLONGED BREATHING OF VAPORS

Use in well ventilated areas. Open windows and doors and turn on fans before use. If the vapors bother you, leave the room while product is working. For sensitive skin or prolonged use, wear gloves.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

WARNING: CAUSES EYE IRRITATION. Do not get in eyes or on clothing. Prolonged breathing of vapors may be irritating. Use only in well-ventilated areas. Avoid prolonged contact with skin. Harmful If swallowed. Not recommended for use by persons with heart conditions, asthma or other chronic respiratory problems. If vapors bother you, leave the room while product is working.

FIRST AID		
IF IN EYES	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	Take off contaminated clothing. Rinse skin immediately with plenty of water	
SKIN OR	for 15-20 minutes. Call a poison control center or doctor for treatment	
CLOTHING	advice.	
IF	Move person to fresh air. If person is not breathing call 911 or an	
INHALED	INHALED ambulance, then give artificial respiration, preferably mouth-to-mouth if	
	possible. Call a poison control center or doctor for treatment advice.	
HOT LINE NUMBER		
Have the product container or label with you when calling a poison control center or doctor		
or going for treatment. You may also contact 1-888-324-7596 for emergency medical		
information.		

PHYSICAL AND CHEMICAL HAZARDS:

Contains bleach (sodium hypochlorite). Do not mix or use with any other household cleaning products, including acids or ammonia, toilet bowl cleaners or rust removers, as toxic fumes may result.

[Do not use sprayers from other cleaning products with this bottle.] If you use other X-14® products, do not mix with this product or spray both on surfaces at the same time. Rinse surfaces thoroughly between applications of different [X-14®]) products.

[THIS PRODUCT] CONTAINS NO PHOSPHATES.

[This bottle is made of 25% post consumer recycled plastic.]

[Manufactured By:]

WD-40 Company 1061 Cudahy Place San Diego, CA 92110 www.thebathroomexpert.com Made in U.S.A. ©2006