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

JUN 4 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Elizabeth Anne Brown  
Authorized Agent for,  
ETI H2O  
1725 Gillespie Way  
El Cajon, CA 92020

Mail to: Steptoe and Johnson  
1330 Connecticut Ave., N.W.  
Washington, DC 20036-1796

Subject: EPA Registration Number 72977-3  
Your Amendment dated January 15<sup>th</sup>, 2010  
EPA Received Date January 15, 2010

The amendment referred to above, submitted in connection with registration under section 3 (c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The Agency has no objection to your company's addition of the following microorganisms to the Axen 30 label: Influenza A (H1N1), Swine Influenza (H1N1), Respiratory Syncytial Virus [RSV], Adenovirus Type 2, Equine Herpes Virus Type 1, and Murine Norovirus. The Agency further notes that the CSFs dated 01/12/10, for the basic and alternate #s (1 and 2) formulations, are acceptable.

A stamped copy of the accepted labeling is enclosed. Submit three copies of your final printed labeling to the Agency before distributing or selling the product bearing the revised labeling.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,

A handwritten signature in black ink that reads "M Swindell".

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch I  
Antimicrobials Division (7510P)



DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray is a colorless, odorless broad spectrum antimicrobial disinfectant and deodorizer. Proven to kill bacteria, fungus and viruses\*, AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray should be used on non-porous environmental hard surfaces in Choose from the list below

- homes, offices, hospitals, nursing homes, medical clinics, dental clinics, pharmacies, laboratories, funeral homes, veterinary clinics, animal shelters, kennels, cages, stables, catteries, animal transport vehicles, ambulances, patient transfer vehicles, hotels, restaurants, bars, supermarket(grocery store), schools, colleges, dorm rooms (dormitories), churches, shelters, day care facilities, daycare centers, nurseries, playrooms, playgrounds, recreational facilities, kitchens, restrooms, bathrooms, washrooms, laundry rooms, bedrooms, basements, garage(s), workshops, attics, locker rooms, exercise facilities, gyms, beauty shops or salons, barber shops, spas, health clubs, laundromats, school buses, cars (autos), RV (mobile home), trucks, trailers, shipping containers, rail cars, subways, trains, airplanes, ships, cruise ships, busses, other public transportation vehicles

AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray has been formulated to disinfect hard, non-porous environmental surfaces (painted, glazed tile, plastic, metal, glass, glazed porcelain) and objects including Choose from the list below

- walls, floors, counters, cabinets (cabinet handles), sinks, tubs, exterior toilet (urinal) surfaces, faucet handles, showers, doorknobs, handrails, light switch covers, telephones, appliances, stove tops, bed frames, wheelchairs, over-bed tables, examination tables, waste containers, tables, chairs, patio furniture, equipment tables, lab benches, children's toys, toys, toy boxes, play tables, jungle gyms, playhouses, child car seats, hard surfaces only, booster chairs (seats), strollers (stroller handles), cribs, playpens, activity centers, diaper pails, diaper changing tables, potty(training) seats, laundry hampers, bathroom counters, kitchen counters, desks, grocery carts, computer keyboards, tanning beds

ACCEPTED with COMMENTS EPA Letter Dated: JUN 4 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 72977-3

NOTE: [Bracketed] text is optional wording Bold/italicized text is information only and not part of the label.

**General Information**

AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray successfully killed the following organisms under AOAC protocols (In order to ensure that all organisms listed are killed, you must use the contact times as directed in the Application Instructions):

Organism	Kill Time
<i>Pseudomonas aeruginosa</i>	30 seconds
<i>Salmonella enterica</i>	30 seconds
<i>Staphylococcus aureus</i>	2 minutes
<i>Listeria monocytogenes</i>	2 minutes
Vancomycin resistant <i>Enterococcus faecium</i> (VRE)	2 minutes
Methicillin resistant <i>Staphylococcus aureus</i> (MRSA)	2 minutes
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA)	2 minutes
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA-PVL)	2 minutes
<i>Escherichia coli</i> O157:H7	2 minutes
<i>Acinetobacter baumannii</i>	2 minutes
<i>Campylobacter jejuni</i>	2 minutes
Trichophyton mentagrophytes (Athlete's Foot Fungus)	10 minutes
*HIV type 1- Strain HTLV IIIB	30 seconds
*Herpes Simplex Type 1 VR-733 F(1) Strain	1 minute
*Rotavirus	3 minutes
*Human Coronavirus	3 minutes
*Norovirus [as Feline Calicivirus]	10 minutes
*Avian Influenza A	10 minutes
*Influenza A [VR-544, Hong Kong strain]	10 minutes
*Rhinovirus [R37 VR-1147, Strain 151-1]	10 minutes
*Polio Type 2, [VR-1002, Lansing Strain]	10 minutes

[Fungicidal Activity: AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray is effective against *Trichophyton mentagrophytes*, the Athlete's foot fungus, Use in locker rooms, dressing rooms, shower and bath areas, and exercise facilities.]

[Deodorizes: AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray reduces annoying odors caused by bacteria. Use to control odors in hospitals, nursing homes, public restrooms, animal kennels and barn stalls. In private homes, use in the kitchen, bathroom, sink rooms and basements.]

**APPLICATION INSTRUCTIONS**

Pre-clean surfaces prior to using this product.

**General Disinfection:**

For general disinfection and control of the bacteria *Pseudomonas aeruginosa*, *Staphylococcus aureus*, *Salmonella enterica*, *Listeria monocytogenes*, Vancomycin Resistant *Enterococcus faecium* (VRE), Methicillin Resistant *Staphylococcus aureus* (MRSA), Community Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA), Community Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA-PVL), *Escherichia coli* O157:H7, *Acinetobacter baumannii* and *Campylobacter jejuni* the surface must be completely wet with AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, AXEN® 30™ Disinfectant, Fungicidal & Virucidal Spray provides residual protection from *Pseudomonas aeruginosa*, *Staphylococcus aureus* and *Salmonella enterica* up to 24 hours after initial application. Do not [touch] [contact] treated surface after application if residual protection is to be maintained.

**Fungus Control:**

For effective control of the fungus *Trichophyton mentagrophytes*, the surface must be completely wet with AXEN® 30 Disinfectant, Fungicidal & Virucidal Spray for 10 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

NOTE: [Bracketed] text is optional wording ***Bold/italicized text is information only and not part of the label.***

**ACCEPTED  
with COMMENTS  
EPA Letter Dated:**

JUN 4 2010

Under the Federal Insecticide,  
Fungicide and Rodenticide Act as  
authorized for the pesticide,  
registered under EPA Reg. No. 72977-3



**Additional language for front or back panel**

Kills *Salmonella enterica* [in 30 seconds<sup>†</sup>]  
 Kills *Pseudomonas aeruginosa* [in 30 seconds<sup>†</sup>]  
 Kills *Staphylococcus aureus*  
 Kills *Listeria monocytogenes*  
 Kills germs in 30 seconds<sup>‡</sup>  
 Kills common household germs  
 Kills common household germs including *Salmonella*, *Staphylococcus*, *Listeria*, and *E. coli*.  
 Kills [*Salmonella*], [*Staphylococcus*], [*Listeria*], and [*E. coli*].  
 Kills - Bacteria, Fungus and Virus\*  
 Disinfects common household surfaces<sup>†</sup>  
 Can help reduce the risk [danger] of crdss contamination  
 [Kills] [Eliminates] *Acinetobacter baumannii* [in 2 minutes]  
 [Kills] [Eliminates] *Campylobacter jejuni* [in 2 minutes]  
 [Kills] [Eliminates] MRSA  
 [Kills] [Eliminates] Methicillin Resistant Staph  
 [Kills] [Eliminates] Methicillin Resistant *Staphylococcus aureus*  
 [Kills] [Eliminates] CA-MRSA  
 [Kills] [Eliminates] PVL-MRSA  
 [Kills] [Eliminates] Community Associated MRSA [Methicillin Resistant *Staphylococcus aureus*]  
 [Kills] [Eliminates] VRE  
 [Kills] [Eliminates] Vancomycin-resistant Enterococcus  
 [Kills] [Eliminates] Vancomycin resistant Enterococcus faecium  
 [Kills] [Eliminates] HIV [in 30 seconds<sup>†</sup>]  
 [Kills] [Eliminates] Herpes Simplex Virus  
 [Kills] [Eliminates] Influenza A Virus  
 [Kills] [Eliminates] Rhinovirus  
 [Kills] [Eliminates] Polio Virus Type 1  
 [Kills] [Eliminates] Rotavirus  
 [Kills] [Eliminates] Human Coronavirus  
 [Kills] [Eliminates] Norovirus virus [as Feline Calicivirus]  
 [Kills] [Eliminates] Avian Influenza A on pre-cleaned environmental hard surfaces  
 [Patented] Silver [Ion] Formula  
 No dulling residue  
 Disinfects without bleaching  
 No harsh chemical smell  
 Odorless  
 Disinfects household surfaces  
 No Mixing Required  
 Powered by [Axenohl®] [SDC 2400] [Axenohl Alternate brand name]  
 For daily use  
 Patented formula  
 [U. S. Patent(s) 6,197,814 ; 6,583,176, [additional patent numbers as issued]  
 Other patents pending  
 Use for a [fresh] [home] [environment] [kitchen]  
 Commercial Line  
 Industrial Line  
 Hospital Line  
 Consumer Line  
 Retail Line  
 Freight Line  
 Janitorial Line  
 Janitorial Disinfectant  
 Odoban® [Commercial], [Janitorial], [Earth Choice] (use restricted to the trademark owner)  
 [FAST], [EASY], [EFFECTIVE]  
 This product has demonstrated effectiveness against Influenza A Virus [and Avian Influenza A 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.

**ACCEPTED**  
**with COMMENTS**  
 EPA Letter Dated:

JUN 4 2010

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act as  
 amended, for the pesticide,  
 registered under EPA Reg. No. 72917-3

**KEY:**

\*-Refer to viruses      ‡-Refer to organisms controlled with 30 second kill time

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