

72977-5

07-15-2011

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

ETI H2O, INC.
725 Gillespie Way
El Cajon, CA 92020

JUL 15 2011

AGENT: Steptoe and Johnson, LLP
330 Connecticut Avenue, N.W.
Washington, D. C. 20036-1795

Attention: Juli Mann

Subject: SDC3A
EPA Registration No. 72977-5
Amendment Dated March 1, 2011

The amendment, submitted in connection with registration under section 3©(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, to add use new claims against various bacteria, viruses and fungi, is acceptable, provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3©(5) and sec. 4 uses when the Agency requires all registrants of similar products to submit such data.
2. On page 2 of the proposed label, change "Fiberglass" to read "Sealed fiberglass". Fiberglass is a porous surface.
3. As stated in past reviews, contact time and kill time are synonymous. To present kill time that is different than the contact time is misleading to the end-user.
4. Refer to the enclosed copy of the review under "CONCLUSIONS" and "LABEL" for further comments.

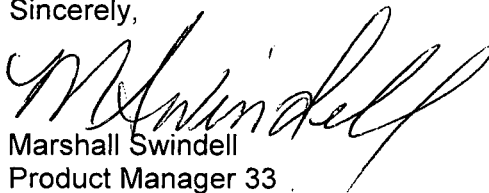
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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EPA Registration No. 72977-5

A stamped copy of the "accepted" product labeling is enclosed for your records. Submit two (2) copies of final printed labeling before you release the product for shipment.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobials Division (7510P)

Enclosure

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SDC3A

[Disinfectant], [Fungicide] [& Virucide*][& Food Contact Surface Sanitizer]

[Disinfects and Deodorizes] • [Food Contact Surface Sanitizer] • [Sanitizer for Food Contact Surfaces] • [Restaurants] • [Hospitals] • [Schools] • [Homes] • [Offices] • [Trucks] • [Trailers] • [Shipping Containers] • [Rail Cars] • [Sanitizer for food [and beverage] processing equipment [facilities]]

Active Ingredient

Silver[†] 0.003%
Citric Acid 4.846%

Other Ingredients 95.151%
Total 100.000%

[†] Electrolytically generated silver ions stabilized in citric acid as silver dihydrogen citrate

KEEP OUT OF REACH OF CHILDREN

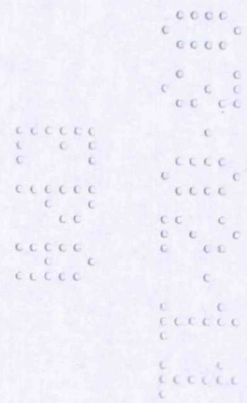
Manufactured by ETI H2O
A Division of PURE Bioscience
1725 Gillespie Way
El Cajon, CA 92020
EPA REG. No. 72977- 5
EPA EST. No. 72977-CA-001
Net Vol.

[Batch Number – may appear on container]

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JUL 15 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. *72977-5*



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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.

[SDC3A] [this product] is a colorless, odorless, broad spectrum antimicrobial [sanitizer], disinfectant and deodorizer. Proven to kill bacteria, fungus and viruses*, [SDC3A] [this product] should be used on non-porous environmental hard surfaces in **Choose from the lists below**

Note: Non food contact sites

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

Note: Food Contact sites

- | | | | |
|-------------------------------------|-------------------------------|--|---|
| beverage plants | delis | egg processing plants | [Food service] [hospitality] |
| food processing plants [facilities] | liquor [convenience] stores | meat [poultry] [fish]processing plants | Cruise ship food processing [preparation] areas |
| food storage areas | eating establishments | meat [poultry] [fish]producing establishments | Dining halls |
| food [beverage] prep areas | supermarkets [grocery stores] | rendering plants | smokehouses |
| institutional kitchens | snack bars | [milk] [fruit] [vegetable] [wine] [ice cream] [potato] processing facilities | |
| cafeterias | dinning rooms | | |
| bars | lunchrooms | | |
| fast food operations | break rooms | | |
| coffee [donut] [bagel]shops | dairy farms [facilities] | | |

[SDC3A] [this product] has been formulated to treat hard, non-porous environmental surfaces ([painted], [glazed tile], [plastic], [non-porous vinyl], [naugahyde], [polyurethane], [plasticized PVC], [butyl rubber (EPDM)], [neoprene], [Viton®], [Teflon®], [silicone] [metal], [glass], [glazed porcelain], [acrylic], [fiberglass], [sealed granite], [sealed marble], [Formica®], [linoleum]) and objects including **Choose from the lists below**

NOTE: Non-food contact surfaces

- | | | | |
|-----------------------------------|----------------------|-------------------------------------|--------------------------|
| walls | appliances | pacifiers | potty[training] seats |
| floors | stove tops | toy boxes | laundry hampers |
| counters | bed frames | play tables | bathroom counters |
| cabinets [cabinet handles] | wheelchairs | jungle gyms | kitchen counters |
| sinks | over-bed tables | playhouses | grocery carts |
| tubs | examination tables | baby furniture | desks |
| exterior toilet [urinal] surfaces | waste containers | child car seats, hard surfaces only | computer keyboards |
| faucet handles | tables | stools chairs [seats] | tanning beds |
| showers | chairs | strollers [stroller handles] | cat litter boxes |
| doorknobs | patio furniture | cribs | animal cages [carriers] |
| handrails | equipment tables | cribs | pet bowls [dishes] |
| light switch covers | lab benches | activity centers | animal feeding dishes |
| telephones | [AC] [heating] vents | diaper pails | non-porous athletic mats |
| remote controls | children's toys | diaper changing tables | |

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EPA Letter Dated:

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General Information

[SDC3A] [this product] 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):

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No. 72977-5

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
Carbapenem resistant <i>Escherichia coli</i>	2 minutes
Carbapenem resistant <i>Klebsiella pneumoniae</i>	2 minutes
Carbapenem resistant <i>Klebsiella pneumoniae</i> , NDM-1 +	2 minutes
Trichophyton mentagrophytes (Athlete's Foot Fungus)	5 minutes
[‡]*HIV type 1[Strain HTLV IIIB]	30 seconds
[‡]*Rotavirus	30 seconds
[‡]*Human Coronavirus	30 seconds
[‡]*Influenza A (H1N1)	30 seconds
[‡]*Swine Influenza A (H1N1)	30 seconds
[‡]*Respiratory Syncytial Virus [RSV]	30 seconds
[‡]*Adenovirus Type 2	30 seconds
[‡]*Avian Influenza A	30 seconds
[‡]*Influenza A [VR-544, Hong Kong strain]	30 seconds
Hepatitis B Virus (HBV) [as Duck Hepatitis B Virus]	1 minute [60 seconds]
Hepatitis C Virus (HCV) [as Bovine Diarrhea Virus]	1 minute [60 seconds]
*Murine Norovirus [MNV-1]	1 minute [60 seconds]
* Norovirus [as Feline Calicivirus]	1 minute [60 seconds]
*Herpes Simplex Type 1 [VR-733 F(1) Strain]	1 minute [60 seconds]
*Rhinovirus [R37 VR-1147, Strain 151-1]	1 minute [60 seconds]
*Polio Type 2 [VR-1002, Lansing Strain]	1 minute [60 seconds]

[Fungicidal Activity: [SDC3A] [this product] is effective against *Trichophyton mentagrophytes*, the Athlete's foot fungus. Use in locker rooms, dressing rooms, shower and bath areas, and exercise facilities.]

[Deodorizes: When used as directed, [SDC3A] [this product] 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.]

[**SANITIZATION: SDC3A is a food contact surface sanitizer proven to kill 99.999% of the following bacteria in 60 seconds:
Escherichia coli *Staphylococcus aureus*
See application instructions for proper use.]

APPLICATION INSTRUCTIONS

Pre-clean surfaces prior to using this product. [You may use this product for pre-cleaning.]

[General Cleaning: Apply to surface until thoroughly wet then wipe the surface clean.]

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

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Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA), Community Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA-PVL), *Escherichia coli* O157:H7, *Acinetobacter baumannii*, *Campylobacter jejuni*, Carbapenem resistant *Escherichia coli*, Carbapenem resistant *Klebsiella pneumoniae*, and Carbapenem resistant *Klebsiella pneumoniae* (NDM-1 [positive] [+]) the surface must be completely wet with [SDC3A] [this product] for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, [SDC3A] [this product] 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.

NOTE: The following condensed instructions may be used in place of the above paragraph.

To kill bacteria, [apply] [spray] [mist] [SDC 3A] [this product] to the surface until thoroughly wet for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, [SDC3A] [this product] 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 [SDC3A] [this product] for 5 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

NOTE: The following condensed instructions may be used in place of the above paragraph.

To kill fungus, [apply] [spray] [mist] [SDC3A] [this product] to the surface until thoroughly wet for 5 minutes. The surface may then be wiped dry with a clean towel. Re-apply when cleaning or when new growth appears.

***Viral Control:**

To kill Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, Influenza A (H1N1), Swine Influenza A (H1N1), Adenovirus Type 2, Respiratory Syncytial Virus [RSV], Murine Norovirus [MNV-1], Norovirus [as Feline Calicivirus], Avian Influenza A, Influenza A Virus [Hong Kong strain], Rhinovirus [R37 Strain 151-1] and Polio Virus Type 2 [Lansing Strain] the surface must be completely wet with [SDC3A] [this product] for 1 minute. The surface may then be wiped dry with a clean towel.

NOTE: The following condensed instructions may be used in place of the above paragraph.

To kill viruses, [apply] [spray] [mist] [SDC3A] [this product] to the surface until thoroughly wet for 1 minute. The surface may then be wiped dry with a clean towel.

Note to Reviewer: The following are optional phrases as outlined in the EPA's Guidance for Testing and Labeling Claims against Pandemic 2009 H1N1 Influenza A Virus (Formerly called Swine Flu)

[Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by influenza A virus. [SDC3A] [This product] is a broad-spectrum hard surface disinfectant that has been shown to be effective against [Influenza A Virus (H1N1)], [Influenza A Virus], [Avian Influenza A Virus] and [Swine Influenza A Virus (H1N1)] and is expected to inactivate all Influenza A viruses including Pandemic 2009 H1N1 (formerly called swine flu).]

[SDC3A] [[This product] has demonstrated effectiveness against Influenza A virus and is expected to inactivate all influenza A viruses including Pandemic 2009 H1N1 influenza A virus.]

Kills HIV-1, HBV and HCV on pre-cleaned environmental 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 HIV HBV or HCV): **Instructions for Cleaning and Decontamination Against HIV, HBV and HCV on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids:** **Personal Protection:** When handling items soiled with blood or body fluids, use appropriate barrier protection such as latex gloves, gowns, masks and eye coverings. **Cleaning Procedure:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this disinfectant. **Contact Time:** Apply [SDC3A] [this product] to area to be treated. Allow the surface to remain wet for 30 seconds to kill HIV-1. Use 1 minute for HBV and HCV. The surface may then be wiped dry with a clean towel. These contact times will not control all organisms listed on this label. Refer to application instructions for other organisms. **Disposal of Infectious Materials:** Blood and other body fluids should be autoclaved and disposed of according to federal, state and local regulations for infectious waste disposal.

Sanitization [of food contact surfaces]

Do not use this product on utensils, dishes or glassware.

NOTE TO REVIEWER: Products labeled only for consumer/residential/ commercial use will include the following directions for use:

[To] Sanitize Food Contact Surfaces

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 5 of 11

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Spray, pour or spread [SDC3A] [this product] on surface until thoroughly wet. Let stand for 60 seconds [one minute] and wipe with a clean towel or allow to air dry. No rinsing is required.

** [SDC3A] [This product] kills 99.999% of *Escherichia coli* [E. coli] and *Staphylococcus aureus*.

NOTE TO REVIEWER: Products labeled for commercial/industrial/food processing area use will include the following directions for use:

To sanitize food contact surfaces

or

To sanitize food processing equipment and other hard surfaces in food processing locations, dairies, restaurants and bars:

[Recommended] for sanitizing food processing equipment, dairy equipment, sink tops, countertops, refrigerated storage and display equipment, and other hard nonporous surfaces. Recommended for use in restaurants, dairies, food processing plants [establishments] [facilities] and bars.

[Clean, Rinse Sanitize]

Prior to application, remove gross food particles and soil by pre-flush or pre-scrape and when necessary, pre-soak. Thoroughly wash objects to be sanitized with a good detergent or cleaner followed by a potable water rinse prior to applying sanitizer. A potable water rinse is allowed after application as a sanitizer.

Apply [SDC3A] [this product] by spraying or by total immersion. Surfaces must remain wet for 60 seconds [1 minute].

If the [article] [surface] cannot be washed and rinsed, clean thoroughly in an appropriate fashion prior to sanitizing.

**[SDC3A] [This product] is a ready to use sanitizer that eliminates 99.999% of the following bacteria in 60 seconds:
Escherichia coli *Staphylococcus aureus*

-OR-

Prior to use in a federally inspected meat and poultry plants and dairies, food products and packaging materials must be removed from the room or carefully protected. A potable water rinse is not permitted following the use of this product as a sanitizer on previously cleaned hard, non-porous surfaces, provided that the surfaces are adequately drained before contact with food so that little or no residue remains.

Apply [SDC3A] [product] to pre-cleaned hard surfaces by thoroughly wetting surfaces with a cloth, mop, sponge, sprayer or by immersion. Surfaces should remain wet for 1 minute followed by adequate draining and air drying.

**[SDC3A] [This product] is a ready to use sanitizer that eliminates 99.999% of the following bacteria in 60 seconds:
Escherichia coli (ATCC 11229) *Staphylococcus aureus*

[DIRECTIONS FOR SANITIZING FOOD PROCESSING EQUIPMENT AND FOOD CONTACT ARTICLES REGULATED BY 21CFR Sec. 178.1010b(22), c(17):

1. Scrape flush or presoak articles to remove gross food particles and soil.
 2. Thoroughly wash articles in an appropriate detergent or cleaner.
 3. Rinse articles thoroughly with potable water.
 4. Sanitize articles by immersion in [SDC3A] [this product] for 60 seconds. Articles too large for immersion should be thoroughly wetted with [SDC3A] [this product] by rinsing, spraying or swabbing.
 5. Remove immersed items from solution to drain and air dry. Non-immersed items should also be allowed to air dry.]
- [U.S. PUBLIC HEALTH SERVICE FOOD SERVICE SANITIZATION RECOMMENDATIONS CLEANING AND SANITIZING:
Equipment shall be thoroughly pre-flushed or pre-scraped and pre-soaked when necessary to remove gross food particles and soil.
1. Thoroughly wash equipment in a hot detergent solution. Rinse equipment thoroughly with potable water.
 2. Sanitize equipment by immersion for 60 seconds at a temperature of 75°.
 3. For equipment that is too large to immerse, apply [SDC3A] [this product] by rinsing, spraying or swabbing until thoroughly wetted.
 4. Allow sanitized surfaces to drain and air dry. No potable water rinse is allowed.]

[BEVERAGE DISPENSING EQUIPMENT SANITIZER DIRECTIONS

For sanitizing of bottling or pre-mixed dispensing equipment after cleaning thoroughly rinse equipment with a potable water rinse. Fill equipment with [SDC3A] [this product] and allow to remain in the equipment for at least 60 seconds. Sanitizing solution should be drained from the system. To insure the removal of flavors, it is suggested that during changeover between products the system should be cleaned, rinsed and flushed with the sanitizing solution for at least 1 minute. Drain thoroughly and allow to air dry before reuse. No potable water rinse is allowed.]

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 6 of 11

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[FOR SANITIZING IN FISHERIES, MILK, WINE, CITRUS, POTATO & ICE CREAM PROCESSING PLANTS: For use as a sanitizer on conveyor belts and equipment [to reduce or eliminate odors in the processing area]. Also for use on filling equipment to reduce bacteria. Follow directions for sanitizing food contact surfaces.]

[WISCONSIN STATE DIVISION OF HEALTH DIRECTIONS FOR EATING ESTABLISHMENTS

1. Scrape and pre-wash articles whenever possible.
2. Wash with a good detergent or compatible cleaner.
3. Rinse with potable water
4. Sanitize in [SDC3A] [this product] without diluting. Immerse all articles for at least one minute or for contact time specified by governing sanitary code.
5. Place sanitized articles on a rack or drain board to air dry.

NOTE: A clean potable water rinse following sanitization is not permitted under Section HFS 196.13 of the Wisconsin Administrative Code.]

NOTE: Optional refill instructions

To refill [spray bottles]:

1. [REMOVE] Remove trigger sprayer [or cap] from empty bottle
2. [POUR] Remove cap from refill and pour contents directly into empty [bottle].
3. [USE] Replace trigger sprayer and use as you normally would.

NOTE: The following language will be printed on the label of products intended to be sold to health facilities:

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly 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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.

NOTE: The following may only be used on the back or side panel of the label if a supplemental registrant obtains an NSF listing:



-OR-

[NSF Listed]
[Include NSF Listing Number]

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Optional marketing phrases

[Kills] [Eliminates] [Effective against] [Defends against] Choose one or more from the list below:

- Salmonella enterica [in 30 seconds*]
- Pseudomonas aeruginosa [in 30 seconds*]
- Staphylococcus aureus
- Listeria monocytogenes
- Acinetobacter baumannii [in 2 minutes]
- Campylobacter jejuni [in 2 minutes]
- MRSA or [Methicillin Resistant Staph] or [Methicillin Resistant Staphylococcus aureus]
- CA-MRSA or [Community Associated MRSA] or [Community Associated Methicillin Resistant Staphylococcus aureus]
- CA-MRSA-PVL
- VRE or [Vancomycin-resistant Enterococcus] or [Vancomycin resistant Enterococcus faecium]
- Escherichia coli O157:H7 [E. coli]
- Carbapenem resistant Escherichia coli [in 2 minutes]
- Carbapenem resistant Klebsiella pneumoniae [in 2 minutes]
- Carbapenem resistant Klebsiella pneumoniae [(NDM-1 [+]) [positive]] [in 2 minutes]
- Tricophyton mentagrophytes
- HIV [in 30 seconds*]
- Herpes Simplex Virus [in 1 minute]
- Influenza A Virus [in 30 seconds*]
- Rhinovirus [in 1 minute]
- Polio Virus Type 1 [in 1 minute]
- Rotavirus [in 30 seconds*]
- Human Coronavirus [in 30 seconds*]
- Norovirus [as Feline Calicivirus] [in 1 minute]
- Avian Influenza A on pre-cleaned environmental hard surfaces [in 30 seconds*]
- Respiratory Syncytial Virus [RSV] [in 30 seconds*]
- Adenovirus [type 2] [in 30 seconds*]
- Influenza A (H1N1) [in 30 seconds*]
- Swine Influenza A (H1N1) [in 30 seconds*]
- Murine Norovirus [in 1 minute]
- Hepatitis B Virus [HBV] [in 1 minute]
- Hepatitis C Virus [HCV] [in 1 minute]

- Kills germs in 30 seconds*
- Kills common household germs
- Kills germs [on surfaces you touch most]
- Kills common household germs including [Salmonella enteric], [Staphylococcus aureus], [Listeria monocytogenes], and [E. coli].
- Kills [Salmonella], [Staphylococcus], [Listeria], and [E. coli].
- Kills - Bacteria, Fungus and Virus*
- Disinfects [Defends against] common household surfaces
- Kills [Defends against] [common] [cold] and [flu] virus[s]
- Defends against germs that can make you sick
- Disinfectant, Fungicidal & Virucidal* Spray
- Can help reduce the risk [danger] of cross contamination
- [Effective against] [Kills] multiple drug resistant bacterium
- Fast acting disinfectant
- Designed for practical use
- [Patented] Silver [Ion] Formula
- No dulling residue
- Disinfects without bleaching
- No harsh chemical smell
- Odorless
- Contains no [dyes] or [artificial fragrances]
- Colorless
- Ready-to-Use [Formula]
- No mixing required
- Eliminates odors caused by bacteria
- Disinfects household surfaces
- No Mixing Required
- Powered by [Axeohl®] [SDC 2400] [Axeohl Alternate brand name]
- For daily use
- Refill

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[Worldwide] Patented formula
 [U.S. Patent(s) 6,197,814 ; 6,583,176, 7,261,905, [additional patent numbers as issued]
 Other patents pending
 Use for a [fresh] [home] [environment] [kitchen]
 Commercial [Line] [Disinfectant]
 Industrial [Line] [Disinfectant]
 Hospital [Line] [Disinfectant]
 Consumer [Line] [Disinfectant]
 Retail [Line] [Disinfectant]
 Freight [Line] [Disinfectant]
 Janitorial [Line]
 Janitorial Disinfectant
 Cruise Line Disinfectant
 [FAST], [EASY], [EFFECTIVE]
 [Antimicrobial] [antibacterial] disinfectant
 Leaves surfaces disinfected
 For use on high touch surfaces
 Travel size
 For use in (insert use site from label)
 For use on (insert use surface from label)
 [Ideal for] [Formulated for] [Hospitality Environment(s)] [Institutional] [Childcare Environment(s)] [Medical Environment(s)] [Nursing Environment(s)] [Healthcare Environment(s)] [Athletic Environment(s)] [Educational Environment(s)]
 A New Generation of Protection
 A New Generation Disinfectant
 As seen on TV may include graphic

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Made in the USA [may include graphic of American flag]
 [SDC3A] [This product] has demonstrated effectiveness against Influenza A Virus [Avian Influenza A Virus] [Swine 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.

The following phrases can also be used for products labeled as a food contact sanitizer

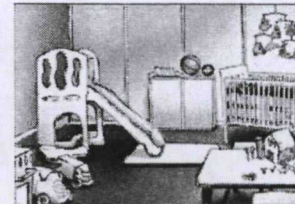
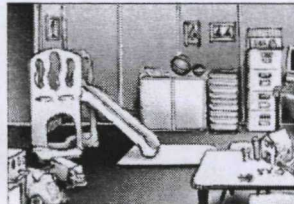
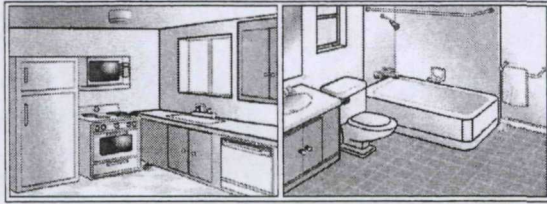
No Rinsing required
 No Rinse Formula
 No Rinse sanitizer
 Sanitize without rinsing
 For daily [use] [sanitization]
 Sanitizes kitchen surfaces
 Household sanitizer
 Institutional sanitizer
 Kills 99.999% of bacteria [in 60 seconds]**
 Kills 99.999% of Escherichia coli (E. coli) [in 60 seconds]**
 Kills 99.999% of Staphylococcus aureus [in 60 seconds]**
 Kills 99.999% of bacteria that cause food borne illnesses [food poisoning]
 Effective sanitizer for food contact surfaces
 For use in [insert one or more of the use sites listed on the label]
 For use on [insert one or more of the use surfaces listed on the label]
 For sanitizing [insert one or more of the food contact use surfaces]
 No [measuring] [mixing] required
 Effective sanitizer for food [and beverage] processing equipment [facilities]

KEY:

- *-Refer to viruses
- ‡-Refer to organisms controlled with 30 second kill time
- ** Refers to sanitizer claims

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These or similar optional graphics may be used to demonstrate use sites (graphics are larger here than they will appear on the label)



THE FOLLOWING TABLE IS OPTIONAL TEXT:

Organism	ID
<i>Pseudomonas aeruginosa</i>	ATCC#15442
<i>Staphylococcus aureus</i> ¹	ATCC#6538
<i>Salmonella enterica</i> ¹	ATCC#10708
<i>Listeria monocytogenes</i> ¹	ATCC#19111
Vancomycin resistant <i>Enterococcus faecium</i> (VRE)	ATCC#700221
Methicillin resistant <i>Staphylococcus aureus</i> (MRSA)	ATCC#700698
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA)	NRS123, USA 400
Community Associated Methicillin resistant <i>Staphylococcus aureus</i> (CA-MRSA-PVL)	NRS 192
<i>Escherichia coli</i> O157:H7	ATCC#43888
<i>Acinetobacter baumannii</i>	ATCC#19606
<i>Campylobacter jejuni</i>	ATCC#29428
Carbapenem resistant <i>Escherichia coli</i>	BSLI#082710-EcCP1
Carbapenem resistant <i>Klebsiella pneumoniae</i>	BSLI#081710KPC4
Carbapenem resistant <i>Klebsiella pneumoniae</i> , NDM-1 +	ATCC#BAA-2146
Trichophyton mentagrophytes (Athlete's Foot Fungus)	ATCC#9533
*HIV type 1- Strain HTLV IIIB	HTLV-IIIB
*Herpes Simplex Type 1 VR-733 F(1) Strain	ATCC VR-733
*Rotavirus	Strain WA, Ottawa
*Human Coronavirus	ATCC VR-740
*Influenza A (H1N1)	ATCC VR-1469
*Swine Influenza A (H1N1)	ATCC VR-333
*Respiratory Syncytial Virus [RSV]	ATCC VR-26
*Adenovirus Type 2	ATCC VR-846
*Murine Norovirus	MNV-1.CW1
*Norovirus [as Feline Calicivirus]	ATCC VR-782
*Avian Influenza A	ATCC VR-2072
*Influenza A [VR-544, Hong Kong strain]	ATCC VR-544
*Rhinovirus [R37 VR-1147, Strain 151-1]	ATCC VR-1147
*Polio Type 2, [VR-1002, Lansing Strain]	ATCC VR-1002
Hepatitis B Virus (HBV) [as Duck Hepatitis B Virus]	Hepatitis B Virus Testing, Inc., Lot 7/31/07 pool
Hepatitis C Virus (HCV) [as Bovine Diarrhea Virus]	Strain Oregon (24v) genotype 1

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL 15 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No. 72977-5

NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 11 of 11