

72977-5

08-03-2011

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

AUG 3 2011



United States
Environmental Protection
Agency

Office of Pesticide Programs

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

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 July 20, 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.

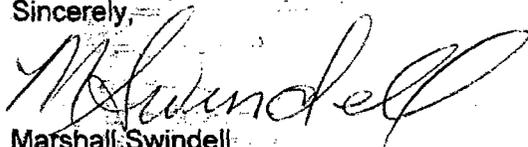
If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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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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14

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:

AUG 3 2011

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

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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]
offices
hospitals
nursing homes
medical clinics
dental clinics
infirmary
blood bank[s]
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
military [installations]
[locations]
day care facilities
daycare centers
nurseries
playrooms
playgrounds

recreational facilities
prisons [jails]
kitchens
[public] restrooms
bathrooms
washrooms
laundry rooms
bedrooms
basements
garage(s)
workshops
attics
locker rooms
exercise facilities
gyms [gymnasium]
beauty shops [salons]
barber shops
spas

health clubs
laundromats
airports
school buses
cars [autos]
RV [mobile home]
trucks
trailers
shipping containers
rail cars
subways
trains
airplanes
ships
cruise ships
busses
other public transportation vehicles

Note: Food Contact sites

beverage plants
food processing plants
[facilities]
food storage areas
food [beverage] prep areas
institutional kitchens
cafeterias
bars
fast food operations
coffee [donut] [bake] shops

delis
liquor [convenience] stores
eating establishments
supermarkets [grocery stores]
snack bars
dinning rooms
lunchrooms
break rooms
dairy farms [facilities]

egg processing plants
meat [poultry]
[fish] processing plants
meat [poultry]
[fish] producing establishments
rendering plants
[milk] [fruit] [vegetable]
[wine] [ice cream] [potato]
processing facilities

[Food service] [hospitality]
Cruise ship food processing
[preparation] areas
Dining halls
smokehouses

[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
floors
counters
cabinets [cabinet handles]
sinks
tubs
exterior toilet [urinal]
surfaces
faucet handles
showers
doorknobs
handrails
light switch covers
telephones
remote controls

appliances
stove tops
bed frames
wheelchairs
over-bed tables
examination tables
waste containers
tables
chairs
patio furniture
equipment tables
lab benches
[AC] [heating] vents
children's toys
toys

pacifiers
toy boxes
play tables
jungle gyms
playhouses
baby furniture
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
grocery carts
desks
computer keyboards
tanning beds
cat litter boxes
animal cages [carriers]
pet bowls [dishes]
animal feeding dishes
non-porous athletic mats

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NOTE: [Bracketed] text is optional wording. **Bold/italicized text is information only and not part of the label.** Page 2 of 12

Under the Federal Insecticide,
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NOTE: Food Contact Surfaces

counters [countertops]	food cases	carts	refrigerators
dish racks	dairy cases	racks	freezers
drainboards	food contact surfaces	chiller tanks	microwaves
highchairs [trays]	food trays	conveyor systems	toasters
breast pump [parts]	stovetops	labeling machines	cooking equipment
lunch boxes[pails]	blenders	packaging equipment	ovens
picnic tables	meat cutting machines	canning equipment	ranges
drinking fountains	bread slicing machines	descalers	grills
kitchen surfaces	mixing equipment [mixers]	skinning equipment	fryers
food processing equipment	kitchen appliances	filleting machines	choppers
bottling equipment	[meat], [fish], [poultry]	homogenizers	crispers
pre-mixing equipment	washers	evaporators	cutters
blenders	blanchers	dryers	shelving
[food] processors	dicers	clarifiers	bins
beverage bars [equipment]	slicers	storage tanks	cabinets
buffet counters	grinders	cheese making equipment	sinks
salad bars	shredders	processing vessels	basins
snack counters	stuffers	pumps	faucets
cutting boards	scalders	pasteurizers	bakery equipment
plastic and other non-	pickers	filling line equipment	coffee and tea equipment
porous chopping blocks	shackles	Tanks	steam tables
coolers	saws	Kettles	warming equipment
ice[machines] chests	trolleys	filling, seaming, sealing and	concession equipment
ice cream machines	hooks	capping equipment	[processing] vacuums
[equipment]	tables	pulpers	[processing] hand [power]
yogurt machines	hoists	juicers	tools
[equipment]refrigerator bins	sorters	millers	
used for meat, vegetables,	scales	grinders	
fruit and eggs	cones	ovens	
[refrigerated] food display	deboners	extractors	
equipment	separators	blanchers	

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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):

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.]

ACCEPTED
with COMMENTS
EPA Letter Dated:

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 Associated Methicillin resistant *Staphylococcus aureus* (CA-MRSA), Community Associated Methicillin resistant *Staphylococcus aureus*

AUG 3rd 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

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NOTE: [Bracketed] text is optional wording. ***Bold/italicized text is information only and not part of the label. Page 4 of 12***

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(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 use 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 use 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 use 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 appropriately disposed of according to federal, state and local regulations for infectious waste disposal.

ACCEPTED
with COMMENTS
EPA Letter Date:

AUG 3 2011

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

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.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this product is 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 5 of 12

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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This statement will be used on NONREFILLABLE CONTAINERS.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area away from direct sunlight at temperatures above freezing.

Pesticide Disposal: Nonrefillable Container. Do not reuse or refill this container –or– [Refill only with this product. Do not reuse or refill except as described in the directions for use.]. If empty: Place in trash or offer for recycling if available. Rinse thoroughly before discarding in trash or recycling.

This statement will be used on REFILLABLE CONTAINERS (typically 55 gallons or larger).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry area away from direct sunlight at temperatures above freezing. Store in original container.

Pesticide Disposal: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a national Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Container Handling: Refillable Container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into a mix tank or storage tank. Fill the container about 1/4 full with solvent used in the end use product. Replace and tighten closures. Agitate vigorously or recirculate water with a pump for 2 minutes. Pour or pump rinsate into mix tank or rinsate collection system for later use or disposal. Repeat this rinsing procedure two more times.

IN CASE OF EMERGENCY

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact [CHEMTREC 1-800-424-9300] or [the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 9 a.m. to 5 p.m.] for emergency medical treatment information.

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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

Designed to save you time

Inspired by how you want [need] to disinfect

Invented to disinfect the way you want [need]

Your time is important so our kill times are fast

Meets EPA requirements for Toxicity Category IV

[Patented] Silver [ion] Formula

No dulling residue

[Compatible with] [Safe for use on] [most] hard non-porous surfaces

Disinfects without bleaching

No harsh chemical smell

Odorless

Fragrance free

Contains no [dyes] or [artificial fragrances]

Contains [no] [non] VOC emitting ingredients

Ammonia free [formula]

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Bleach free [formula]
 Alcohol free [formula]
 Phenol free [formula]
 Contains no phosphates
 Does not contain [chlorine] bleach [or] [ammonia] [alcohol] [phenols]
 [This product] contains no [chlorine] bleach [alcohol] [phosphates] [or ammonia]
 Colorless
 Ready-to-Use [Formula]
 No mixing required
 Eliminates odors caused by bacteria
 Disinfects household surfaces
 No Mixing Required
 Powered by [Axeonol®] [SDC 2400] [Axeonol Alternate brand name]
 For daily use
 Refill
 [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



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

ACCEPTED
 with COMMENTS
 EPA Letter Dated:

AUG 3 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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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**

ACCEPTED
with COMMENTS
EPA Letter Dated:

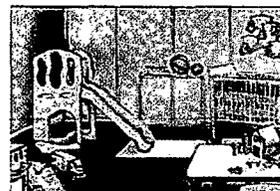
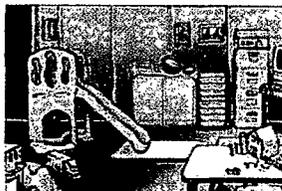
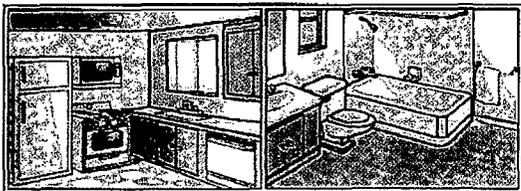
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These or similar optional graphics may be used to demonstrate use sites (graphics are larger here than they will appear on the label)



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)	NR5123, 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
<i>Trichophyton mentagrophytes</i> (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]	Hepadnavirus Testing, Inc., Lot 7/31/07 pool
Hepatitis C Virus (HCV) [as Bovine Diarrhea Virus]	Strain Oregon: C24v-genotype 1

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NOTE: [Bracketed] text is optional wording. Bold/italicized text is information only and not part of the label. Page 12 of 12