4/30/2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

SEPA United States Environmental Protection Office of Pesticide Programs

APR 30 2009

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FILE COPY

Luann Shoemaker Principal Consultant Agent for Prestige Brands, Inc. c/o Compliance Services International P.O. Box 1342 Springfield, VA 22151

Subject:

74965-2

:: Comet with Bleach Disinfectant Cleanser EPA Registration No. 74965-2 Application Date: March 16, 2009 Receipt Date: March 24, 2009

Dear Ms. Shoemaker:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable with the conditions listed below:

- Addition of optional labeling claims
- Revision to precautionary statements on front label
- Repetition of claims against Staphylococcus aureus, Salmonella choleraesuis, and
- Pseudomonas aeruginosa

Conditions:

- On page two (2) of the product label, you must remove the following words and phrases from the proposed optional marketing statements: "ultra-clean" and "safely". These claims are considered false and misleading.
- On page three (3) of the product label, you must revise the Precautionary Statements to read as follows: "CAUTION: Moderately irritating to eyes, skin, and mucous membrane. Avoid contact with eyes, skin or clothing. Harmful if swallowed or inhaled. Avoid breathing vapor. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Do not mix with products that contain ammonia or dangerous fumes may result."
- On page three (3) of the product label, you must revise the First Aid Statement so that the last three routes of exposure read as follows:

"IF ON SKIN: 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 SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: 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. Call a poison control center or doctor for further treatment advice."

General Comments:

A stamped copy of the labeling accepted with conditions is enclosed. Submit one (1) copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions of comments concerning this letter, please contact Wanda Henson at 703-308-6345.

Sincerely,

Ende

Emily H. Mitchell Product Manager (32) Regulatory Management Branch II Antimicrobials Division (7510P)

FRONT OF LABEL

Comet[®] With Bleach Disinfectant Cleanser

May Appear: Value Pack/Value Size/Club Pack/Club Size Scratch Free Bleaches Out Tough Stains Disinfects as it Cleans Disinfects While you Clean Disinfects While you Clean Disinfects and Cleans Tough Stains Kills Household Germs* Kills Germs* Kills Germs* Cleans Tough Stains Picture of Lemon LEMON FRESH

ACCEPTED with COMMENTS EPA Letter Dated:

APR 30 2009

Under the Foderal Incecticide, Prograde, the Foderal Incecticide Act as representation are particide, representation EPA Rag. No. 7

74965-2

ACTIVE INGREDIENT: Sodium dichloro-s-triazinetrione dihydrate1.2%OTHER INGREDIENTS:98.8%TOTAL100.0%

Net Weights

KEEP OUT OF REACH OF CHILDREN. CAUTION: MODERATE EYE & SKIN IRRITANT. MAY BE HARMFUL IF SWALLOWED OR INHALED. READ PRECAUTIONS ON BACK.

SIDE PANELS Top

STORAGE/DISPOSAL:

Store in a cool, dry place. Discard empty container in trash. • The surfactants in Comet[®] are biodegradable or

or

· Biodegradable surfactants

· CONTAINS NO PHOSPHORUS

· CONTAINS NO PHOSPHATES

UPC Symbol

May Appear:

recycled

material

symbol

[Fiberboard] • Package contains at least 75% recycled (minimum 50% post consumer use) [Plastic]

• Container made from 100% post-consumer recycled plastic

Distributed by The Spic and Span Co. Irvington, NY 10533, a Prestige Brands Company

SIDE PANELS Bottom

QUESTIONS? COMMENTS? CALL TOLL FREE 1-800-926-9441

Visit www.cometcleanser.com

EPA Reg. No. 74965-2 EPA Est. No.

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BACK LABEL

May Appear:

- Pictures of application Icons: Sink, Stove, Toilet, Bathtub, Grill
- KITCHEN SINKS AND COUNTERTOPS: Brightens porcelain, makes Corian®** solid surfaces ultra-clean, puts the glisten back into stainless steel and safely cleans tough, crusty food stains
- **STOVES:** Cuts grease and scours off cooked-on food.
- BATHROOM SINKS, TUBS, TILE, FIXTURES: Cuts through soap scum and mildew stains on porcelain, fiberglass, and glazed ceramic tile.
- **TOILET BOWL:** Disinfects the toilet bowl as it cleans.
- Pictures of other Comet Products
- COMET[®] offers a complete line of products for your home's toughest cleaning needs.
- Use Comet[®] Disinfectant Cleanser to clean TOUGH GREASY FOOD STAINS, DIRT AND SOAP SCUM.
- Comet[®]'s NO SCRATCH FORMULA*** contains no harsh abrasives.
- Use Comet[®] for many tough cleaning problems around the house such as the kitchen, tub, and toilet bowl. Use this NO SCRATCH*** formula on porcelain, stainless steel, and fiberglass.
- Comet[®] cleans/bleaches out/bleaches/wipes out tough mildew stains.
- DISINFECTS WHILE YOU CLEAN
- Scratch Free
- Use for tough cleaning problems all around your house. This all purpose cleanser cleans and disinfects porcelain, stainless steel, fiberglass, Corian®** solid surfaces, natural marble, and glazed ceramic tile without scratching.***
- Picture of Lemon LEMON FRESH

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO DISINFECT NON-POROUS SURFACES:

Sprinkle on wet surface, rub gently to cleanse, let stand 5 minutes, and rinse. To disinfect toilet bowls: flush, sprinkle 4 oz. onto bowl surfaces, scour thoroughly, let stand 10 minutes, and flush. Wipes out most household germs including Staphylococcus aureus, Salmonella choleraesuis, and Pseudomonas aeruginosa.

TO CLEAN:

For most problems, sprinkle on wet surface or sponge, let sit for 15 seconds, rub and

rinse. If problem remains, wet surface, sprinkle again, let stand for one minute, rub and rinse.

May Appear:

To clean extra tough stains like pot marks or to bleach out greasy food stains, sprinkle on wet surface, let stand one minute, scour and rinse. Repeat if necessary.

NOTE:

May Appear:

* Comet® kills most household germs including Staphylococcus aureus, Salmonella choleraesuis, and Pseudomonas aeruginosa.

**Corian® is a registered trademark of E.I. du Pont de Nemours and Company.

***On delicate surfaces like plastic, imitation marble and appliance enamel, use plenty of water, rub gently and rinse. For unfamiliar surfaces, test small area first. Do not use on silver, painted surfaces, walls, soft plastic, aluminum or rubber items (except tires). Do not mix with other products, especially toilet bowl cleaners or products that contain ammonia.

PRECAUTIONARY STATEMENT: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION:

Keep out of reach of children and pets

Moderately irritating to eyes, skin and mucous membrane

Avoid contact with eyes, skin and clothing

May be harmful if swallowed or inhaled

Do not mix with products that contain ammonia or dangerous fumes may result.

FIRST AID: 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 a doctor for treatment advice.

IF ON SKIN: In case of accidental contact, wash skin thoroughly with water. Remove contaminated clothing an continue to wash with water. If irritation develops or persists, contact a doctor.

IF SWALLOWED: Do not induce vomiting. Drink 1-2 glasses of water and contact a doctor or poison control center immediately.

IF HNHALED: Remove to fresh air. If coughing persists, call a doctor.

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 1-800-926-9441 for emergency medical information

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