

U.S. ENVIR. AMENTAL PROTECTION AGENCY Office of Pesticide Programs Antimicrobials Division (7510P) 1200 Pennsylvania Avenue NW Washington, D.C. 20460

EPA Reg. Number:

Date of

Issuance:

74965-3

MAR 1 5 2011

Term of Issuance:

Conditional

Name of Pesticide Product:

COMET SprayGel

FILE COPY

NOTICE OF PESTICIDE:

Registration Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Spic and Span 90 North Broadway Irvington, NY 10533

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce: In any correspondence on this product always refer to the above EPA registration? number

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision No. D-441369) is registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA section 4.
- 2. Make the labeling changes listed below before you release the product for shipment:

a. Revise the "EPA File Symbol to read, EPA Reg. No. 74965-3"

Signature of Approving Official

Date:

MAR 1 5 2011

Wanda Y. Henson

Acting Product Manager Team (32) Regulatory Management Branch II Antimicrobials Division (7510P)

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- b. The Agency does not stamp labels with Alternate/Additional Brand name labels. The requested Alternate Brand names are acceptable, but have been removed from the attached label.
- c. On page 2 of the label under directions for use add "Open in well ventilated area" to "Open a window or turn on a fan..." statement.
- d. On pages 3 and 6 of this label all references to **porous surfaces** and **disinfectant** as it relates to Mold and Mildew have been removed.
- e. On page 3 add the phrase "Remove gross filth and clean prior to disinfecting" under use directions for the claims "To Kill Mold & Mildew on Hard, Nonporous Surfaces" and "To Disinfect Toilet Bowls". Separate Toilet Bowl Cleaning and Toilet Bowl Disinfectant directions for use.
- f. The label must be updated for Container Disposal to add "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."
- g. On pages 5, 6 and 7 of this label all references to **99.9% or 99.999%** and **disinfectant** as it relates to Mold and Mildew have been removed. In cases where the statement supports the germs or bacteria claims "Mold and Mildew" have been removed from the label. The quantitative claims, **99.999%** are unacceptable. The 5 log₁₀ reductions are limited to food contact sanitization claims.
- h. On pages 6 and 9 the following allergens have been removed: Cat allergens, cockroach allergens, cockroach particles, dog allergens, dust mite particles, dust mite allergens, hair, pet allergens, pet dander, pet hair and pollen allergens. The Agency does not require data for non-living allergens to be submitted to support the claims. These allergens are to broad or could be considered as living allergens.
 - i. On pages 7, 8 and 9 the following unsubstantiated marketing claims have been removed:
 - Disinfects with the power of bleach (Heightened Efficacy)
 - more than from the statement "Kills more than (99.9%)(99.999%)..." (Misleading)
 - at its source from the statement "Penetrates to (kill)(eliminate) and destroy tough mold, mildew and bacteria at its source."
 - Use regularly for maximum home hygiene
 - (Thick) Gel (formula) Reduces bleach fumes
 - Foaming This is a gel product.
 - See it and believe it
 - Prevents the growth of mold and mildew
 - Prevents mold and mildew
- j. On pages 7 and 8, it is stipulated that organisms listed on the label should be inserted after the claim, or surfaces or use sites or soils. You must provide tables to correlate to the organisms, surfaces and use sites and soils.
- k. Revise the Precautionary statement to read: "Corrosive. Causes skin burns. Causes moderate eye irritation. Do not get on skin, in eyes or on clothing. Wear protective clothing and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using restroom. Remove and wash contaminated clothing before reuse."

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Based on the data submitted this product is toxicity category I for primary skin irritation which requires Child-Resistant Packaging (CRP) data/information. Please submit data/information for Agency review and acceptance.

The accepted alternate brand names are as follows: COMET Mold and Mildew Stain Remover; COMET Mildew Stain Remover; COMET Mildew Stain Remover Spray Gel; COMET Mildew Stain Remover Spray Gel; and COMET Mildew Remover Spray Gel

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

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.

A stamped copy of the label is enclosed for your records. Should you have any questions regarding this letter, please contact me either by phone at (703) 308-6345 or email at Henson.Wanda@epa.gov.

Sincerely,

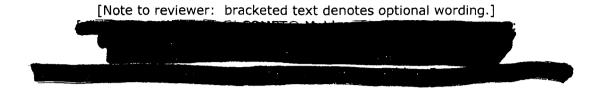
Wanda Y. Henson

Acting Product Manager Team 32 Regulatory Management Branch II Antimicrobials Division (7510P)

Enclosures: (Stamped Label)

40912

COMET® SprayGel



ACTIVE INGREDIENT

SODIUM HYPOCHLORITE

OTHER INGREDIENTS TOTAL

2.38% 97.62% 100.00%

ACCEPTED
with COMMENTS
in EPA Letter Dated:

Yields 2,28% available chlorine

MAR 1 5 2011

KEEP OUT OF REACH OF CHILDREN **DANGER**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 74965-3

[EYE/SKIN IRRITANT. USE ONLY IN WELL VENTILATED AREAS.]

FIRST AID	
If on Skin or Clothing	 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 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.
Note to Physicia lavage.	n: Probably mucosal damage may contraindicate the use of gastric
	ontainer or label with you when calling a Poison Control Center or for treatment. You may also contact 1-800-926-9441 for emergency ent information.

SEE [BACK][SIDE][OTHER] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

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{©2010} Distributed by The Spic and Span Co.

90 North Broadway
Irvington, NY 10533. A Prestige Brands Co.
{Art #} {Made in XXXXX.}
{UPC# 6-78112-xxxxx-x}

Questions? Comments? Call toll-free 1-800-926-9441

{EPA Reg. No. 74965-xx}
{Net contents}
{EPA Est. No.}

Comet SprayGel (74965-G)
March 9, 2011
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50412

(Removes) (Cleans) tough mildew (stains) easily (and conveniently) while the gel formula helps to reduce bleach fumes, making it more pleasant to use. Great for use on {insert surfaces}.

(Removes) (Cleans) tough mildew (stains) easily (and conveniently) while the gel formula helps to reduce bleach fumes, making it more pleasant to use. **Inside the home**: great for {insert surfaces}. **Outside the home**: use on {insert Surfaces}.

DIRECTIONS FOR USE

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

Read entire label prior to use.

Open a window or turn on a fan. For sensitive skin or prolonged use, wear rubber gloves.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAR 1 5 2011

SHAKE WELL.

Turn sprayer nozzle to ON position.

[or]

Turn nozzle to "SPRAY" position

[or]

Turn nozzle to [spray symbol] position

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

74965-3

(TO ATTACH SPRAYER) – (To attach and operate sprayer:) Remove sticker from cap. Open the flip top on cap. Extend hose from sprayer. Firmly insert black hose tip into opening until it snaps into place. Adjust nozzle. Squeeze trigger until liquid is dispensed. After use turn the spray nozzle to X (off). Do not disconnect the hose from the bottle. [*Graphic of nozzle*]

To Refill (Bottle): Remove trigger sprayer. Pour in product from refill container and replace trigger.

[or]

To Refill (Bottle): Remove trigger unit from empty bottle and attach to new bottle.

TO CLEAN (/ Deodorize) Spray 6 to 8 inches from surface until thoroughly covered. Wipe with a clean cloth or sponge and rinse. On tough stains, allow to sit for several minutes then wipe or rinse clean.

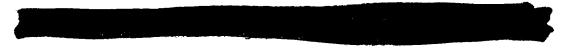
TO CLEAN SOAP SCUM (/Lime scale) (and) (Greasy) (Soil): Spray, wait a few minutes, wipe with sponge. Heavy soap scum or mildew buildup may need two cleanings. This product may not be able to remove soap scum and mildew embedded in hard water deposits, old grout or silicone caulking.

FOR SOAP SCUM (PROBLEMS): Use Comet® Bathroom Cleaner.

TO REMOVE MILDEW STAINS: Spray, wait until stains disappear and rinse. Heavy mildew buildup may require longer contact time, or two cleanings.

(TO REMOVE ALLERGENS†: Spray 6 to 8 inches from surface until thoroughly covered. Wipe with a clean cloth or sponge and rinse.)

TO KILL MOLD & MILDEW ON HARD, NONPOROUS SURFACES such as glazed ceramic tile: Spray surface until thoroughly wet, let stand 10 minutes, and rinse.



TO CLEAN FLOORS:

Mop washable floors including no-wax floors, linoleum, vinyl and ceramic tile with 1 cup Comet SprayGel per gallon of warm water. Rinse for best shine.

TO CLEAN CEMENT POOL AREAS:

Apply liberally (full strength) and rinse.

TO CLEAN VINYL AND PLASTIC OUTDOOR FURNITURE:

Sponge on full strength and rinse immediately.

Avoid prolonged contact with metal or old porcelain. Do not use on wood, painted surfaces, marble, or aluminum. Avoid contact with clothes, fabrics, carpets or paper surfaces to prevent potential discoloration. For all other surfaces, before using this product perform a spot test.

DISINFECTION

Open a window or turn on a fan. If vapors are strong, leave the room while the product is working and return after time specified below. Pre-clean surface. (Spray) (Apply to) surface until thoroughly wet. Leave for 10 minutes before wiping.

TO CLEAN AND DISINFECT TOILET BOWLS:

Flush toilet and add 1 cup Comet SprayGel to bowl. Brush to thoroughly wet all surfaces including under rim. Let stand 10 minutes before flushing.

(Hard non-porous surfaces) (Hard non-porous surfaces) (such as glazed ceramic tile) Spray surface until thoroughly wet, let stand for 10 minutes, keeping surface moist, wipe with a damp cloth or rinse. For heavily soiled areas clean first before following disinfecting instructions.

TO KILL) MOLD & MILDEW ON HARD, NONPOROUS SURFACES such as glazed ceramic tile: Spray surface until thoroughly wet, let stand 10 minutes, and rinse.

Avoid prolonged contact with metal or old porcelain. Do not use on wood, painted surfaces, marble, or aluminum. Avoid contact with clothes, fabrics, carpets or paper surfaces to prevent potential discoloration. For all other surfaces, before using this product perform a spot test.

ACCEPTED
with COMMENTS
in EPA Letter Dated:
MAR 1 5 2011

Comet SprayGel (74965-G) March 9, 2011 Page 3 of 9

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the position, registered under EPA Reg. No. 74965.

PRECAUTIONARY STATEMENTS HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes skin burns. Do not get on skin, in eyes or on clothing. Wear protective clothing and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using restroom. Remove and wash contaminated clothing before reuse.

PHYSICAL AND CHEMICAL HAZARDS

This product contains bleach. Do not use or mix this product with other household chemicals such as products containing ammonia, toilet bowl cleaners, rust removers, vinegar or acid. To do so will release hazardous gases.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store this product in a cool, dry area, away from direct suplight and heat to avoid deterioration

sunlight and heat to avoid deterioration.

Pesticide Disposal: Product or rinsates that cannot be used should be diluted

with water before disposal in a sanitary sewer.

Container Disposal: Refillable container. Do not reuse or refill this container except as described in the directions for use. Refill only with this product. Recycle empty container or discard in trash.

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in EPA Letter Dated:
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Under the Federal Insecticide,
Fungicide, and Rodenlicide Act as
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registered water FFA Rog. No.

[CLAIMS]

<<Introductory 6-month claims >>

(New) (Improved) (Formula) (Scent) (Easy Grip Bottle) (New & Improved)

Value (Pack / Size)

Club (Pack / Size)

Bonus (Pack / Size)

("x" volume / weight / %) Free

("x" volume / weight / %) More

Multipack

Trial (Pack / Size)

Commercial (Pack / Size)

(Economy -or- Convenient) refill

Economy size

Recycle Symbol

Get rid of mold

(This) (package) (bottle) (container) is 100% Recyclable

(This) (package) (bottle) (container) (is) made of {insert%} (post-consumer)

recycled (material) (plastic)

Front Label / back label Claims <<may appear>>

(Removes) (Eliminates) (wipes out) (Kills) (Destroys) of Household (Mold &) Mildew* (Kills) (Destroys) (Disinfects) (Removes) (Eliminates) (wipes out) of Germs** (Kills) (Destroys) (Removes) (Eliminates) (wipes out) (Mold &) Mildew (Kills) (Destroys) (Removes) (Eliminates) (wipes out) %) of Mold & Mildew * (Kills) (Destroys) (Removes) (Eliminates) (wipes out) of Indoor & Outdoor Mold & Mildew* (Removes) (Eliminates) (wipes out) Indoor and (Kills) (Destroys) Outdoor Mold and Mildew* (Destroys) (Disinfects) (Removes) (Eliminates) (wipes out) (Germs**) (as it Cleans)(!) (Mold &) MILDEW (STAIN) REMOVER (Removes) (Eliminates) (wipes out) (mold &) mildew (Kills) (Destroys) (and bacteria) (Cleaning Power) (Mold & Mildew Remover with Bleach) (Multi-Action) (Multi-Clean) (Multi-Purpose) (Multi-Surface) (One-Step Cleaner) (Power Gel) Disinfects as it cleans big jobs Disinfects as it (Kills) (Destroys) (Removes) (Eliminates) (wipes out) (common household) ((and bacteria**) Disinfects with bleach Easily removes mildew, mold and bacteria and also quickly destroys and kills them in hard-to-clean areas such as caulking, corners and crevices, without scrubbing Easily removes (tough) (mold &) mildew from grout Even mold isn't too tough for Comet SprayGel

> Comet SprayGel (74965-G) March 9, 2011 Page **5** of **9**

ACCEPTED
with COMMENTS

in EPA Letter Dated:

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ragisterad under EPA Rag. No. 744965-3

Under the Federal Insecticide,

Under the Federal Insecticide, Fungraide, and Rodenbaide Achasis amended, for the pasticide, registered under EPA Reg. No.

...)

Controls the growth of mold and mildew
Destroys mold and mildew
Disinfects, deodorizes and (kills) (eliminates) odor-causing germs**

Disinfects with Bleach

Easily removes tough (mold) (and) mildew) from grout Effective against: {insert organisms listed on the label} Effective against: athlete's foot fungus, mold & mildew* Even mold isn't too tough for Comet SprayGel® Got Mold? (Kill) (Destroy) (Eliminate) (Wipe Out) (Remove it) with Comet SprayGel® Helps prevent the growth of mold and mildew Kills germs** bàcteria** Kills ((Kills) (Destroy) (Eliminate) (Wipes Out) (Removes) visible mold (Kills) (Destroys) (Eliminates) (of) (tough) w) (&) (germs) (without scrubbing) (Kills) (Destroys) (mold) (and) (mildew) (Kills) (Eliminates) germs** (Kills) (Eliminates) germs on hard, non-porous surfaces** (Kills) (Eliminates) germs** (Kills) (Eliminates) (Removes) mold and mildew Kills germs on hard, non-porous surfaces ** Kills (household) germs** Kills: (Aspergillus niger) (and) (Trichophyton mentagrophytes). Kills: (Pseudomonas aeruginosa) (Salmonella enterica) (Staphylococcus aureus) Kills 1 bacteria Kills odor-causing bacteria (Kills) (Removes) (mold) (mildew) Penetrates to (kill) (eliminate) and destroy tough mold, mildew and bacteria (Powers through (cuts) (cleans) (touch) (household) (stains) (and) Prevents mold and mildew Prevents the growth of mold and mildew

Brightens as it cleans Cleans better than ever Confidence of Comet Contains (fast-acting) grease cutters Deep Down Clean!

Disinfects as it cleans

Effective: Cleans, (Shines) (Disinfects) (and) (Deodorizes) washable (surfaces)

({insert surfaces}) (in) ((insert use sites))

For use in (insert use sites)

Fresh Clean Scent

Great for everyday (cleaning), (deodorizing) (and) (disinfecting)

Removes general soils, food stains, mold, mildew and soap scum.

Great whitening power

Has a clean (fresh) (pleasant) scent

Leaves a (bright) (brilliant) (vibrant) shine

Nonabrasive formula (rinses away easily)

(This product) contains no phosphates

Leaves a sparkling shine

Powers out greasy dirt, mildew stains and tough food stains. Powers through (soap scum) (and) (grease) (better than ever)

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in EPA Letter Dated:

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Under the Federal Insecticide,
Fungacide, and Redenticide Act as
amended, for the posticide,
registered under EPA Reg. No. 744965-3

Powers through (tough) (grease) (and) (soap scum) (better than ever) (Reduces) (removes) (eliminates) (controls) (neutralizes) (the most) (common) (household) (allergens†) (around your home) (around your kitchen) (around your

bathroom) (on your floors)

(Reduces) (removes) (eliminates) (controls) (neutralizes) {insert allergens}

Removes allergens†

Removes {insert soils} from {insert use sites}

Removes mildew stains and soap scum

Removes soap scum

Removes (the toughest) (tough) stains

Removes tough (insert soils)

Removes tough: soap scum, bathtub rings, mildew (stains), hard water (stains)

Removes tough spots and stains

Removes tough stains and soap scum

Whitening power

Whitening stain remover

Whitens and removes mold (stains) and mildew stains

Whitens and removes stains and greasy dirt

Whitens as it cleans

Whitens in floors and walls Whitens bathtubs, showers, floors and walls

Whitens to a (sparkling) shine

tens to a (sparking) since

Fresh Scent!

(whitening) No scrub (formula)

Whitening action

Sticks to (Mold &) Mildew*

Sticks to it and Kills it!*

Stick it (and Kill it)

(Gel) Sticks to (Mold &) Mildew (Stains)

STICKS to Mildew!

BLEACHES away Stains!

BLEACHES away (MOLD &) MILDEW (Stains)

(Plus) (Contains) (with) (the power of) bleach

(The) (thick) gel formula sticks to mildew with (concentrated) bleaching power to disinfect (clean) / (bleach) away (tough) (the toughest) (ugly) (mold and) mildew (stains)!

Bathrooms, sinks and faucets and floor areas

(Brilliantly) cleans (tile), (grout), (surfaces) (before your eyes)

(Brilliantly) whitens (tile), (grout), (surfaces) (before your eyes)

(Brilliantly) whitens (tile), (grout), (surfaces) (for an intense clean)

(Clinging) (Attacking) (Extreme) Gel

(Deep) Penetrating Gel

(Deep) (Penetrating) Gel clings to mildew (stains)

(Gel) attacks (mold &) mildew (stains) deep down

Gel (hold) (stays) (longer) on (tough) (mold &) mildew (stains)

(Gel) penetrates soap (scum) (grime)

Gel action attacks (mold &) mildew (deep down) (for a powerful Clean)

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Under the Federal Insecticide,
Fungicide, and itodenticide Extas
amended, for the pesticide,
registered under EPA Reg. No.

Powerful Cleaning Gel Gel Action for (a Powerful Clean) (control) trigger [option -or- setting] for a deep clean (Just) spray and wipe: no scrubbing required! Leaves no residue Low price {compared to XXX} More Savings, Less Waste[!] New -and/or- (Improved) Thicker Gel (No Waste) (Wasteless) Bottle (Now) available in (this) (a) (convenient) refill (bottle) so you can reuse your (trigger) (sprayer) (Over) {insert %} more for the same price {as xxxxx} Powers through soap scum -and/or- grime Same (great) (Comet) performance, (insert%) lower price (compared to our previous price)! Same (great) (Comet) performance, now (insert%) cheaper (compared to our previous price)! Same (great) [Comet] performance, now better value (compared to our previous price)! See the difference Comet makes Watch Comet clean Cuts through -and/or- (starts to) dissolve(s) soap scum (on bathroom surfaces) (Deep) (Penetrating) Gel provides (great) control to reach mildew (stains) even in cracks -and/or- crevices -and/or- corners No mess from thin runny sprays Visit cometcleanser.com for ingredient information. (Aspergillus niger), (Trichophyton *Kills (mentagrophytes) on hard, non-porous surfaces in 10 minutes. **Kills (Eliminates) (Pseudomonas aeruginosa), (Salmonella (choleraesuis) enterica), (Staphylococcus aureus) on hard, non-porous surfaces in 10 minutes. , cockroach debris, cockroach matter, dust mite debris, (

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Under the Federal Insecticide, Fungions, and translated Act as amended, for the published, registered under IPA Heg. No. 14965–3