

74965-3

08/16/2011

1/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

AUG 16 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Micah T. Reynolds
Regulatory Consultant for Spic and Span
Technology Sciences Group Inc.
1150 18th Street
Suite 1000
Washington, DC 20036

Subject: Comet Spraygel
EPA Reg. No. 74965-3
Application Dated: June 6, 2011
Receipt Date: June 6, 2011

Dear Mr. Reynolds:

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

Proposed Amendment:

- Label Amendment

Conditions:

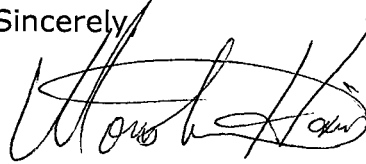
1. On page 5, delete "(Mold &) Mildew*" from the statement beginning "Disinfects as it (Kills) (Destroys)..." as this phrase cannot be associated with a disinfection claim.
2. On page 8, delete the statement "(Thick) Gel (formula) Reduces bleach fumes" as this statement is not supported by data and, therefore, cannot be substantiated.
3. On page 10, add "(exterior)" following "Stove" and "Kitchen appliances" to qualify these surfaces as non-food contact surfaces.

General Comments:

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

Should you have any questions or comments concerning this letter, please contact Wanda Henson on (703) 308-6345 or via email at Henson.Wanda@epa.gov.

Sincerely,



Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL	7510P	7510P	7510P				
SURNAME	Gray	Henson	HARRIS				
DATE	8-15-11	8-15-11	8-15-11				

COMET® SprayGel

[Note to reviewer: (parenthetical) and [bracketed] text denotes optional wording.]
{bracketed text denotes final wording to be inserted}

ACTIVE INGREDIENT

SODIUM HYPOCHLORITE 2.38%

OTHER INGREDIENTS 97.62%

TOTAL 100.00%

Yields 2.28% available chlorine

KEEP OUT OF REACH OF CHILDREN

DANGER

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

FIRST AID	
If on Skin or Clothing	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 Physician: Probably mucosal damage may contraindicate the use of gastric lavage.	
Have 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 treatment information.	

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

{©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. 74965-3}

{Net contents}

{EPA Est. No.}

{Batch code/Lot number}

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:
AUG 16 2011

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May 31, 2011

Response to Comments in March 15, 2011 Conditional Registration

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

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(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. Open in well ventilated area. For sensitive skin or prolonged use, wear rubber gloves.

SHAKE WELL.

Turn sprayer nozzle to ON position.

[or]

Turn nozzle to "SPRAY" position

[or]

Turn nozzle to [spray symbol] position

(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.

(CLEANING, DEODORIZING, STAIN REMOVAL)

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 CLEAN TOILET BOWLS: Flush toilet. Add 1 cup Comet SprayGel to bowl. Brush to thoroughly wet all surfaces including under rim.

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.

(ALLERGEN REMOVAL)

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

(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 DISINFECT TOILET BOWLS:

Remove gross filth and clean prior to disinfecting. Flush toilet. Add 1 cup Comet SprayGel to bowl. Brush to thoroughly wet all surfaces including under rim. Let stand 10 minutes before flushing.

TO KILL MOLD & MILDEW

(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: Remove gross filth and clean prior to disinfecting. Spray surface until thoroughly wet, let stand 10 minutes, and rinse.

[Note to reviewer: the following label statement to appear on all labels.]

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.

**PRECAUTIONARY STATEMENTS
HAZARDOUS TO HUMANS AND DOMESTIC ANIMALS**

DANGER. 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.

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.

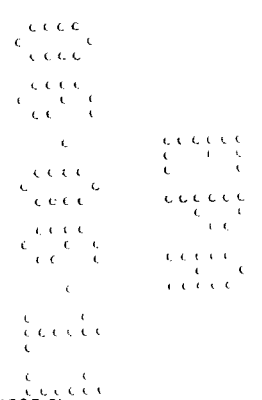
Pesticide Storage: Store this product in a cool, dry area, away from direct sunlight and heat to avoid deterioration.

[Note to reviewer: the following text for 32oz ready-to-use spray bottles]

Pesticide Disposal and Container Handling: Refillable container. Do not reuse or refill this container except as described in the directions for use. Refill trigger bottle only with this product. If not refilling, wrap container and put in trash or offer for recycling if available.

[Note to reviewer: the following text for 32oz - 64oz bottles - for refilling ready-to-use spray bottles or are themselves ready-to-use spray bottles sold with spray triggers.]

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container. Wrap container and put in trash or offer for recycling if available.



[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

(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>>

(Kills) (Destroys) (Removes) (Eliminates) (wipes out) of Household (Mold &) Mildew*

(Kills) (Destroys) (Disinfects) (Removes) (Eliminates) (wipes out) (99.9%) 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*

(Destroys) (Removes) (Eliminates) (wipes out) (of) (Mold) (&) (Mildew*) (&)

(Germs**) (as it Cleans)(!)

(Mold &) MILDEW (STAIN) REMOVER

(Kills) (Destroys) (Removes) (Eliminates) (wipes out) (mold &) mildew (and bacteria)

(Cleaning Power) (Mold & Mildew Remover with Bleach) (Multi-Action) (Multi-Clean)

(Multi-Purpose) (Multi-Surface) (One-Step Cleaner) (Power) (Power Gel)

Disinfects as it cleans big jobs

Disinfects as it (Kills) (Destroys) (Removes) (Eliminates) (wipes out) (common household) (Mold &) Mildew* (and bacteria**)

Disinfects with bleach

Easily removes mildew, mold and bacteria from sealed grout 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 sealed grout

Even mold isn't too tough for Comet SprayGel

Get rid of mold

Got Mold? (Kill) (Destroy) (Eliminate) (Wipe out) (Remove) it with

Comet SprayGel (Kills) (Destroys) (Eliminates) (Wipes out) (Removes) mold, mildew and bacteria as it cleans

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(Kills) (Destroys) (Eliminates) (Wipes out) (Removes) visible mold
 (Kills) (Destroys) (Eliminates) (Wipes out) (Removes) (tough) (mold&) mildew
 without scrubbing
 (Kills) (Destroys) (Eliminates) (Wipes out) (Removes) tough mold, mildew and
 bacteria
 (Proven to) Kill(s) most common household molds
 Lifts off and cleans soap scum to penetrate, kill and destroy mold, mildew and
 bacteria
 Mold is alive. Kill (Destroy) (Eliminate) (Wipe out) (Remove) it with
 Comet SprayGel!
 Mold Killer
 Penetrates to (destroy) (kill) (eliminate) (tough) mold, mildew and bacteria
 at its source
 Comet SprayGel doesn't just clean [the] stains, it (kills) (destroys) (eliminates)
 (wipes out) (removes) (the) mold!
 (Works) (Kills mold) on all (hard, nonporous) (bathroom)
 surfaces
 You've got mold. (Kill) (Destroy) (Eliminate) (Wipe out) (Remove) it with Comet
 SprayGel.
 Our best (soap scum) (remover) (cleaner) (cleaning power) (power cleaner)
 Our best (kitchen) (grease) (and) (soap scum) (cutter) (remover) (ever)
 (Bathroom) (Floor) (Glass & Surface) (Kitchen) (Restroom) (Cleaner) (Deodorizer)
 (Disinfectant)
 (Complete) (Easy) (Easy to use) (Effective) (Extreme) (Fast) (Quick) (Quick & Easy)
 (Ready to Use)
 (Streak-free) (Streak-free formula) (Total) (Versatile) (Clean) (Cleaner) (Cleaning)
 (Degreaser) (Degreases) (Deodorizes)
 (Beautiful) (Bright) (Brilliant) (Glistening) (See-through) (Streak-free) (Shine)
 (Cleans) (Deodorizes) (Disinfects) (and) (Shines) (Grease releaser) (with Grease
 release action)
 (Antibacterial) (Bactericidal**) (Bactericide**) (Cleaner) (Deodorizer) (Deodorizes)
 (Disinfectant) (Disinfects)
 (Germicidal **)

Kills bacteria on hard, non-porous surfaces
 Kills (Eliminates) (99.9%) of bacteria **
 Kills (Eliminates) (99.9%) of bacteria on hard, non-porous surfaces
 (Pseudomonas aeruginosa) (Salmonella enterica) (Staphylococcus aureus)

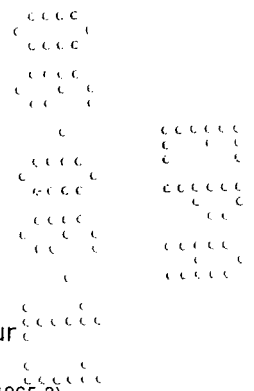
(Even) removes allergens†

This product removes the following allergens: (cat dander) (cockroach debris)
 (cockroach matter) (cockroach particles) (dog dander) (dust mite debris) (dust mite
 particles) (dust mite matter) (pet hair allergens) (pet dander) (pollen particles).

Controls the growth of mold and mildew
 Destroys mold and mildew
 Disinfects, deodorizes and (kills) (eliminates) odor-causing germs**
 Disinfects with Bleach
 Disinfects with the power of bleach
 Easily removes tough (mold) (and) mildew) from sealed 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 (99.9%) of germs**
 Kills (99.9%) of bacteria**
 (Kills) (Destroy) (Eliminate) (Wipes Out) (Removes) visible mold
 (Kills) (Destroys) (Eliminates) (99.9%) (of) (tough) (germs) (without scrubbing)
 (Kills) (Destroys) (mold) (and) (mildew)
 (Kills) (Eliminates) (99.9%) of germs**
 (Kills) (Eliminates) (99.9%) of 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 more than (99.9%) of bacteria
 Kills odor-causing bacteria
 (Kills) (Removes) (mold) (mildew)
 Penetrates to (kill) (eliminate) and destroy tough mold, mildew and bacteria at its source
 (Powers through (cuts) (cleans) (touch) (household) (stains)
 Prevents mold and mildew
 Prevents the growth of mold and mildew
 Removes general soils, food stains, mold, mildew and soap scum.

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)
 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
 Use regularly for maximum home hygiene
 Leaves a sparkling shine
 Powers out greasy dirt, mildew stains and tough food stains.
 Powers through (soap scum) (and) (grease) (better than ever)
 Powers through (tough) (grease) (and) (soap scum) (better than ever)
 (Reduces) (removes) (eliminates) (controls) (neutralizes) (the most) (common)
 (household) (allergen†) (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}

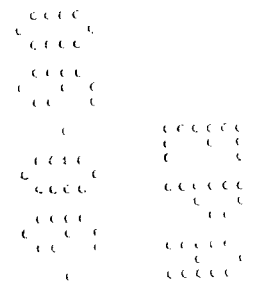
Removes mildew stains and soap scum
Removes soap scum
Removes (the toughest) (tough) stains
Removes tough {insert soils}
Removes tough: soap scum, bathtub rings, mildew (stains), hard water (stains)
Removes tough spots and stains
Removes tough stains and soap scum
Whitening power
Whitening stain remover
Whitens and removes mold (stains) and mildew stains
Whitens and removes stains and greasy dirt
Whitens as it cleans
Whitens floors and walls
Whitens sealed grout in bathtubs, showers, floors and walls
Whitens to a (sparkling) shine

Fresh Scent!

(Thick) Gel (formula) Reduces bleach fumes
(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 (glazed tile), (sealed grout), (surfaces) (before your eyes)
(Brilliantly) whitens (glazed tile), (sealed grout), (surfaces) (before your eyes)
(Brilliantly) whitens (glazed tile), (sealed 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)

Powerful Cleaning Gel

Gel Action for (a Powerful Clean) (control)
Trigger [option -or- setting] for a deep clean



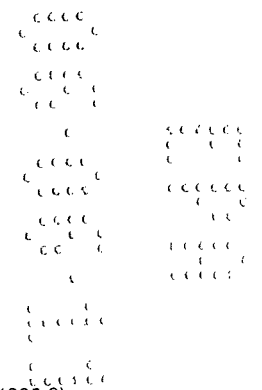
(Just) spray and wipe; no scrubbing required!
 Leaves no residue
 Low price {compared to XXX}
 More Savings, Less Waste[!]
 New -and/or- (Improved) Thicker Gel
 (No Waste) (Wasteless) Bottle
 (Now) available in (this) (a) (convenient) refill (bottle) so you can reuse
 your (trigger) (sprayer)
 (Over) {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 it and believe it
 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 cometcleaner.com for ingredient information.

*Kills (Eliminates) of (*Aspergillus niger*), (*Trichophyton mentagrophytes*) on hard, non-porous surfaces in 10 minutes.

**Kills (Eliminates) (99.9%) of (*Pseudomonas aeruginosa*), (*Salmonella* (*choleraesuis*) *enterica*), (*Staphylococcus aureus*) on hard, non-porous surfaces in 10 minutes.



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[Note to reviewer: The table below and the corresponding cross-references in the optional marketing claims section above serve to define the organisms, sites, surfaces, soils, and non-living allergens for the purposes of the master label text. This table itself will not appear on final container/marketplace labels.]

<< Organisms, Sites, Surfaces, Soils, Non-Living Allergens >>

Disinfection – Hard, non-porous surfaces (10 minute contact time)				
Organisms:	Staphylococcus aureus (ATCC 6538) Salmonella enterica (ATCC 10708) Pseudomonas aeruginosa (ATCC 15442) Trichophyton mentagrophytes (ATCC 9533) [Athlete’s Foot Fungus] Aspergillus niger (ATCC 16404) [mold & mildew]			
Use Sites:	Bathroom	Bedroom	Kitchen^	Family room
	Garage	Mud room	Nursery	Laundry room
	Dining room	Study/office	Play room	Living room
	Vinyl siding	Patios	Deck surfaces (non-wood)	
	Home Exterior			
	^(not on food-contact surfaces)			
Surfaces:	Toilets	Urinals	Showers	Bathtubs (Tubs)
	Bidets	Porcelain	Glazed tile	Sealed Grout
	Stove	Sinks	Tiled wall	Vinyl shower curtain
	Tables	Faucets	Countertop	Kitchen appliances
Soils:	Organic	Food stains	Greasy soils	Mold stains
	Mildew stains	Soap scum	General soils	Tough soils
Non-Living Allergenst†:	Cockroach debris	Dust mite debris	Pet dander	
	Cockroach matter	Dust mite matter	Cat dander	
	Cockroach particles	Dust mite particles	Dog dander	
	Pet hair allergens	Pollen particles		