

752771

2/3/2010

1 of 14



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

toXcel LLC
Agent for Method Products, Inc.
7140 Heritage Village Plaza
Gainesville, VA 20155

FEB 03 2010

Attention: Mike Kelley
Regulatory Manager

Subject: Deuce
EPA Reg. No. 75277-1

This letter acknowledges that the Agency is making a correction to language that was required by the registrant in the last accepted label for this product (letter and label stamped December 9, 2009). At the time the label was issued, EPA required you to characterize all hard non-porous surfaces as "non-food contact". The Agency was not aware that data were submitted to support the product as a food contact disinfectant. You have recently provided information that justifies data were submitted and reviewed by the Agency. That data was deemed acceptable. Therefore, food contact claims are permitted for your product. A stamped label is enclosed for your records.

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,

A handwritten signature in cursive script that reads "M Swindell".

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

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

DEUCE
Disinfectant, Fungicide & Virucide*

[Disinfects and Deodorizes]
[Restaurants] • [Hospitals] • [Schools] • [Homes] • [Offices] • [Trucks] • [Trailers] • [Shipping Containers]
• [Rail Cars]

FEB 08 2010
Under the Federal Insecticide, Fungicide, and Rodenticide Act
75277-1

Method Products Inc
San Francisco, CA 94111
Questions:
[Phone (xxx) xxx-xxxx]
[Visit: www-xxxxxxxxxxx-com]

EPA REG No 75277-1
EPA EST. No 72977-CA-001
Net Contents XX

Active Ingredient
Silver[†] 0.003%
Citric Acid 4.846%
Other Ingredients 95.151%
Total 100.000%

[†]Electrolytically generated Silver ions

KEEP OUT OF REACH OF CHILDREN

30/14

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

DIRECTIONS FOR USE

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

[DEUCE Disinfectant, Fungicidal & Virucidal Spray is a colorless, broad spectrum antimicrobial disinfectant and deodorizer. Proven to kill bacteria, fungus and viruses*, **DEUCE Disinfectant, Fungicidal & Virucidal Spray** should be used on non-porous environmental hard surfaces including:] {If the preceding statement appears in labeling, it will be accompanied by all or selected areas from the following list.}

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

ACCEPTED
 WITH COMMENTS
 in EPA Letter D-0011
 dated 08/18/2010
 for the purpose of
 registration under the
 FIFRA Act

75277-1

[DEUCE Disinfectant, Fungicidal & Virucidal Spray has been formulated to disinfect hard, non-porous [environmental][household][kitchen] surfaces [, such as painted, glazed tile, plastic, metal, glass, and glazed porcelain surfaces,] [and objects including:]

[Effective on][painted, glazed tile, plastic, metal, glass, and glazed porcelain surfaces] [and objects including:]

{If either of the preceding statements appear in labeling, it will be accompanied by all or selected items from the following list.}

- | | | | |
|-------------------|-------------------|---------------------|--------------------|
| [walls | tubs | handrails | wheelchairs |
| floors | exterior toilet | light switch covers | over-bed tables |
| counters | [urinal] surfaces | telephones | examination tables |
| cabinets [cabinet | faucet handles | appliances | waste containers |
| handles] | showers | stove tops | tables |
| sinks | doorknobs | bed frames | chairs |

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

patio furniture	playhouses	playpens	bathroom counters
equipment tables	child car seats, hard	activity centers	kitchen counters
lab benches	surfaces only	diaper pails	desks
children's toys	booster chairs	diaper changing	grocery carts
toys	[seats]	tables	computer
toy boxes	strollers [stroller	potty [training]	keyboards
play tables	handles]	seats	tanning beds]
jungle gyms	cribs	laundry hampers	

[Surfaces:]

<ul style="list-style-type: none"> • [Aluminum • Glazed ceramic [tile] • Chrome • Corian • Enamel • Sealed fiberglass • Formica 	<ul style="list-style-type: none"> • Glass • Sealed granite • Linoleum • Hard plastic • Glazed porcelain [tile] • Stainless steel • Sealed synthetic marble 	<ul style="list-style-type: none"> • Glazed tile • Hard vinyl <p>Do not use on natural marble, brass, or varnished wood; for all other surfaces test in an inconspicuous area -or- spot test all other surfaces in an inconspicuous area.]</p>
--	--	--

REVISIONS
WITH COMMENTS
IN EPA Label Label

FEB 03 2010

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

75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

ACCEPTED
With COMMENTS
in EPA Letter Dated:

General Information

{All of the information in this General Information section of labeling is optional}

FEB 03 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as

[*For general disinfection and control of bacteria including *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* (CA-MRSA-PVL), *Escherichia coli* O157:H7, *Acinetobacter baumannii* and *Campylobacter jejuni*.] When used as directed, DEUCE Disinfectant, Fungicidal & Virucidal Spray 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. Application for 10 minutes provides effective control of fungi, *Trichophyton mentagrophytes*, and [the following viruses:] [Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, 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].]

7527

[DEUCE Disinfectant, Fungicidal & Virucidal Spray 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
<i>Trichophyton mentagrophytes</i> (Athlete's Foot Fungus)	10 minutes
‡*HIV type 1- Strain HTLV IIIB	30 seconds
*Herpes Simplex Type 1 VR-733 F(1) Strain	1 minute
*Rotavirus	3 minutes
*Human Coronavirus	3 minutes
* Norovirus [as Feline Calicivirus]	10 minutes
*Avian Influenza A	10 minutes
*Influenza A [VR-544, Hong Kong strain]	10 minutes
*Rhinovirus [R37 VR-1147, Strain 151-1]	10 minutes
*Polio Type 2, [VR-1002, Lansing Strain]	10 minutes

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

[Fungicidal Activity: Deuce Disinfectant, Fungicidal & Virucidal Spray is effective against *Trichophyton mentagrophytes*, the Athlete's foot fungus, Use in locker rooms, dressing rooms, shower and bath areas, and exercise facilities.]

[Deodorizes: DEUCE Disinfectant, Fungicidal & Virucidal Spray 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.]

ACCEPTED
WITH COMMENTS
in EPA Letter Dated

FEB 03 2010

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

75277-1

70914

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

APPLICATION INSTRUCTIONS

REGISTERED
with EPA
in EPA Label Unit

FEB 03 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
75277-1

[Cleaning Instructions:] [To Clean:] Spray surface [onto soils] and [rub][wipe][scrub]clean.

[General Disinfection:] [To Disinfect:]

{One or more of the following Options will be used on labeling.

{OPTION 1}

To Disinfect [Against] Bacteria, Fungi, and Viruses*: Pre-clean surface. Spray surface until thoroughly wet. Let stand 10 minutes. Then wipe [surface][until] dry.

{OPTION 2}

To Disinfect [Against] Bacteria: Pre-clean surface. Spray surface until thoroughly wet. Let stand 2 minutes. Then wipe [surface][until] dry.

{OPTION 3}

For general disinfection and control of bacteria including *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* (CA-MRSA-PVL), *Escherichia coli* O157:H7, *Acinetobacter baumannii* and *Campylobacter jejuni*.] Pre-clean surface. Spray until thoroughly wet. The surface must be completely wet with **DEUCE Disinfectant, Fungicidal & Virucidal Spray** for 2 minutes. The surface may then be wiped dry with a clean towel. When used as directed, **DEUCE Disinfectant, Fungicidal & Virucidal Spray** 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..

{OPTION 4}

Pre-clean surface. Spray until thoroughly wet. Allow surface to remain wet for 2 minutes. [Then wipe dry.]

{OPTION 5}

[Fungus Control:

[For effective control of the fungus *Trichophyton mentagrophytes*,][The][the] surface must be completely wet with **DEUCE Disinfectant, Fungicidal & Virucidal Spray** for 10 minutes. The surface may then be wiped dry [with a clean towel]. Re-apply when cleaning or when new growth appears.]]

{OPTION 6}

[*Viral Control:

[To kill Herpes Simplex Type 1 [F(1) Strain], Rotavirus, Human Coronavirus, 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][the] surface must be completely wet with **DEUCE Disinfectant, Fungicidal & Virucidal Spray** for 10 minutes. The surface may then be wiped dry with a clean towel.

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

Kills HIV-1 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):

Instructions for Cleaning and Decontamination Against HIV 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 or 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 **DEUCE Disinfectant, Fungicidal & Virucidal Spray** to area to be treated. The surface must be completely wet with **DEUCE Disinfectant, Fungicidal & Virucidal Spray** for 30 seconds. The surface may then be wiped dry with a clean towel. This contact time 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.]

{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 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.

STORAGE AND DISPOSAL	
Storage:	Do not contaminate water, food or feed by storage or disposal.
Disposal:	Nonrefillable container. Triple rinse as follows: Fill container ¼ full with water and recap. Shake for 10 seconds. Follow Pesticide Disposal instructions for rinsate disposal. Drain for 10 seconds after the flow begins to drip. Repeat procedure two more times. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

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 for emergency medical treatment information.]	

ACCEPTED
with COMMENT
in EPA Letter Dated
FEB 03 2010

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

75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

{Additional optional language for front or back panel}

- Kills *Salmonella enterica* [in 30 seconds[‡]]
- Kills *Pseudomonas aeruginosa* [in 30 seconds[‡]]
- Kills *Staphylococcus aureus*
- Kills *Listeria monocytogenes*
- Kills some bacteria in 30 seconds[‡]
- Kills common household germs
- Kills common household germs including *Salmonella*, *Staphylococcus*, *Listeria*, and *E. coli*.
- Kills [*Salmonella*], [*Staphylococcus*], [*Listeria*], and [*E. coli*].
- Kills - Bacteria, Fungus and Virus*
- Disinfects common household surfaces
- Can help reduce the risk [danger] of cross contamination
- [Kills] [Eliminates] *Acinetobacter baumannii* [in 2 minutes]
- [Kills] [Eliminates] *Campylobacter jejuni* [in 2 minutes]
- [Kills] [Eliminates] MRSA
- [Kills] [Eliminates] Methicillin Resistant Staph
- [Kills] [Eliminates] Methicillin Resistant *Staphylococcus aureus*
- [Kills] [Eliminates] CA-MRSA
- [Kills] [Eliminates] PVL-MRSA
- [Kills] [Eliminates] Community Associated MRSA [*Methicillin Resistant Staphylococcus aureus*]
- [Kills] [Eliminates] VRE
- [Kills] [Eliminates] Vancomycin-resistant Enterococcus
- [Kills] [Eliminates] Vancomycin resistant Enterococcus faecium
- [Kills] [Eliminates] HIV [in 30 seconds[‡]]
- [Kills] [Eliminates] Herpes Simplex Virus
- [Kills] [Eliminates] Influenza A Virus
- [Kills] [Eliminates] Rhinovirus
- [Kills] [Eliminates] Polio Virus Type 1
- [Kills] [Eliminates] Rotavirus
- [Kills] [Eliminates] Human Coronavirus
- [Kills] [Eliminates] Norovirus virus [as Feline Calicivirus]
- [Kills] [Eliminates] Avian Influenza A on pre-cleaned environmental hard surfaces
- [Patented] Silver [Ion] Formula
- No dulling residue
- Disinfects without bleaching
- [Contains] No bleach
- [Contains] No petrochemicals
- No harsh chemical smell
- [Free of][no]dye and/or perfumes
- Odorless
- Disinfects household surfaces
- No Mixing Required
- Powered by [SDC 2400]
- For daily use
- Patented formula
- [U.S.Patent(s) 6,197,814 ; 6,583,176, [additional patent numbers as issued]

ACCEPTED
 with COMMENTS
 in EPA Letter Dated
 FEB 03 2010

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 amended, for the purpose of
 registered under EPA...

75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

Other patents pending

Use for a [fresh] [home] [environment] [kitchen]

Commercial Line

Industrial Line

Hospital Line

Consumer Line

Retail Line

Freight Line

Janitorial Line

Janitorial Disinfectant

[FAST], [EASY], [EFFECTIVE]

KEY:

*-Refer to viruses

‡-Refer to organisms controlled with 30 second kill time

APPROPRIATE
FOR DISINFECTANTS
in EPA Label Format

FEB 08 2003

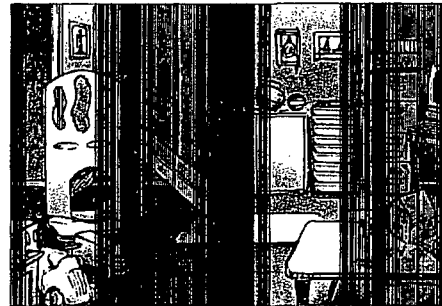
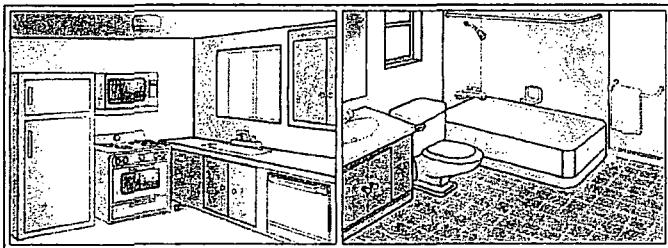
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
amended, for the pesticide,
registered under EPA Reg. No.

75277-1

{Alternate language for the front or back panel}

[Formulated for] [Hospitality Environment] [Institutional] [Childcare Environments] [Medical & Nursing Environment]

{Representation of optional graphics (graphics are larger here than they will appear on the label)}



{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}



ACCEPTED
with COMMENTS
in EPA Letter Docket
FEB 03 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
[unclear] under EPA Reg. No.
75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

{THE FOLLOWING TABLE IS OPTIONAL}

[

Organism	ID
<i>Pseudomonas aeruginosa</i>	ATCC#15442
<i>Staphylococcus aureus</i>	ATCC#6538
<i>Salmonella enterica</i>	ATCC#10708
<i>Listeria monocytogenes</i>	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
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
* 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

ACCEPTED
with CO-OP
in EPA Letter D-1000

FEB 03 2010

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

75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

{Additional Antibacterial Claims – OPTIONAL}

Anti-Bac[terial]

[Antibacterial] kitchen cleaner

Bac Attack

Beat Germ

Bye-bye [germs][bacteria]

Cleans as it kills [[germs][bacteria]] [and/or] [disinfects] [sanitizes]

[germ][bacteria] Buster

[germ][bacteria] Jail

[germ][bacteria] Patrol

[germ][bacteria] Police

[germ][bacteria] Squad

[germ][bacteria] Terminator

Germinator

[Kills] [eliminates] [destroys] [wipes out] 99[.99]% of [household] [germs] [bacteria]

{Additional General Claims – OPTIONAL}

[You deserve] A cleaner clean

Citrus [Leaf] scent

[Cuts] [Tough on] [grease] [and/or grime] [and/or- stains]

[Won't harm][Will not harm][any] [all][kitchen] surfaces

Great cleaning comes naturally to us

Hello clean

Made by and for the people against dirty

Never tested on animals

No harsh fumes

Psst: It's always a good idea to test in an inconspicuous place first

Wont' harm kitchen surfaces

Packaging Claims:

100% recycled bottle[plastic]

Bottle contains PCR

[Innovative] [cool] [Sleek] [fun] [unique] design

Recycle [for good karma]

Website Reference:

The [anti-bac] facts: www.xxxxxx.com

[The right] to be informed: www.xxxxxx.com

The whole truth: www.xxxxxx.com

Visit us at: www.xxxxxx.com

Get the skinny: www.xxxxxx.com

ACCEPTED
with COMMENTS
to EPA Lower Docket

FEB 03 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No.
75277-1

{MASTER LABEL}

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

{All text in braces {xxx} is administrative & will not appear on a printed label.}

Sample Copy 1:

There's a new antibac in town that's tough on grease and grime and won't harm surfaces Plus you'll be happy to know that it kills [[99.9% of]] germs][bacteria], leaving nothing behind but a fresh scent and a smile. That's a cleaner clean.

Sample Copy 2:

We're peace loving but if your mission is to kill [germs][bacteria], we've got your back: anti-bac, that is.

It's a [new] method that kills [99.9% of] germs -or- bacteria, all in a formula [that won't harm surfaces][that's easy on surfaces]. BAM! Take that, dirty germs

Sample Copy 3:

There's something to that whole killing me softly thing. So we say, kill all the germs -or- bacteria you want, but do it

[the method[easy] way][without harming surfaces]. Our [new] method kills [99.9% of] germs -or- bacteria that [won't harm][will not harm] surfaces. It still cleans like heck and smells like heaven, so now when you put the hurt on germs -or- bacteria, you can breathe easy about it.

Sample Copy 4:

If you're looking to get rid of every last trace of dirt + germs -or- bacteria, we've got what you need right here: antibac. It's tough on the nasty stuff but [won't harm][will not harm] surfaces. Next time you're on the hunt for germs -or- bacteria, tell'em we sent you.

Fragrance Descriptors:

- go naked
- [Free of][no]dye and/or perfumes
- citrus leaf
- green melon
- green fern
- green leaf
- watercress
- laurel leaf
- bamboo
- ivy vine

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 75277-1