

75277-2

01/22/2010

1/10

U.S. ENVIRONMENTAL PROTECTION  
AGENCYOffice of Pesticide Programs  
Antimicrobials Division (7510C)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

## NOTICE OF PESTICIDE:

☒ Registration  
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.

Number:

75277-2

Date of Issuance:

JAN 22 2010

Term of Issuance:

Unconditional

Name of Pesticide Product:

FREAK

Name and Address of Registrant (include ZIP Code):

Method Products, Inc  
637 Commercial Street  
San Francisco, CA 94111

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-419404) is conditionally 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 Registration Symbol to read, "EPA Reg. No. 75277-2".

b. Under "Non-Food and Food Contact Sanitizing" directions, indicate "hard, nonporous surfaces."

Signature of Approving Official:

Jacqueline Campbell-McFarlane, Acting Product Manager Team-34  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Date:

JAN 22 2010

c. Revise the "Food Contact Sanitizing" directions contact time to read "*1 minute*" such that it is in agreement DIS/TSS 17, Labeling Requirements for Pesticides Used for Sanitation of Food Contact Surfaces.

d. Statements or claims that express the absence of certain ingredients are considered false and misleading to 40 CFR 156.10(a)(5)(i) and 40 CFR 156.10(a)(5)(viii) because it implies that this product is less risky, better, or more desirable than a product containing the ingredient(s) in question. Therefore, revise or delete the following claims:

1.) Revise the 10<sup>th</sup> claim on page 3 by deleting the phrase, "using non dirty ingredients".

2.) Delete claims 7-10 on page 4

e. Phrases such as "[naturally] [plant] [based] [derived]" and "plant derived ingredients" are considered false and misleading because they are implied safety claims to consumers. This product's formulation contains other ingredients that would not be defined as naturally plant derived. Therefore, these phrases must be deleted from pages 3, 4, and 5 of the label.

f. Delete the website references on page 4. The Agency has embarked on a 36 month pilot program beginning January 25, 2010 regarding the acceptance of certain factual statements. The factual statements pilot outlines parameters for acceptable website references on the label. If you want to support websites on your label, you must revise this section and resubmit as a notification or label amendment.

g. Qualify the surfaces, enamel, fiberglass, granite, and tile, as hard nonporous by stating "*baked*" enamel, "*sealed*" fiberglass, "*sealed*" granite, and "*glazed*" tile on page 6.

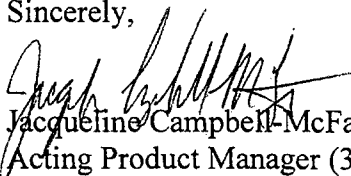
h. Delete the "Representative icons" on page 7 because they are false and misleading.

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 Stacey Grigsby at (703) 308-6440 or grigsby.stacey@epa.gov.

Sincerely,



Jacqueline Campbell-McFarlane

Acting Product Manager (34)

Regulatory Management Branch II

Antimicrobials Division (7510P)

Enclosure: Stamped Label  
Acute Toxicology DER

| CONCURRENCES |  |  |  |  |  |  |  |
|--------------|--|--|--|--|--|--|--|
| SYMBOL       |  |  |  |  |  |  |  |
| SURNAME      |  |  |  |  |  |  |  |
| DATE         |  |  |  |  |  |  |  |

410

[optional language]

{note to agency}

# FREAK

Hard surface disinfectant and/or sanitizer

|                                 |        |
|---------------------------------|--------|
| Active Ingredients: Citric Acid | 5.0%   |
| Other Ingredients               | 95.0%  |
| Total                           | 100.0% |

**[CAUTION]**  
**KEEP OUT OF REACH OF CHILDREN**

EPA Reg. No. 72577-R

EPA Est. No

Net Contents XX

Method Products Inc

San Francisco, CA 94111

Questions:

Phone [(xxx) xxx-xxxx]

Visit: [www-xxxxxxxxxxx-com]

{Precautionary Statements: Likely toxicity category IV; OPTIONAL}

**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 doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor.

**Directions for Use:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Cleaning Instructions:** Spray surface [onto soils]-and- [rub][wipe][scrub]clean

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
JAN 22 2010

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

75277-2

[optional language]

{note to agency}

**Sanitizing Instructions:**

To Sanitize Non-Food Contact Surface: Spray until thoroughly wet. [Let stand [for] 5 minutes.] [Then] [let stand 5 minutes before wiping] [wipe]. For heavily soiled [areas] [surfaces], [a] precleaning [step] is required.

**Claims:**

**[Kitchen] Sanitizer**

[Antibac] [Antibacterial]

[Cleans] [shines] [sanitizes] [kitchen] [household] [surfaces] [and/or] [fixtures] [throughout the home] [house]

Kills [99.9%] of [Staphylococcus aureus][ Enterobacter aerogenes] [on hard, nonporous surfaces][in 5 minutes]

Kills [household] bacteria [and sanitizes without bleaching]

Kills 99.9% of [household] bacteria [in 5 minutes]

One step cleaning and sanitizing

**Sanitizing Instructions (Food Contact):**

[To kill 99.9% of bacteria on [all] surfaces] –or- [sanitizes [all] surfaces]. Spray [this product] on surface [until thoroughly wet]. Let stand for 30 seconds. Wipe [with [paper towel] –and/or- [microfiber][clean][dish] [towel] –and/or- [cloth]]. For heavily soiled[areas][surfaces],[a] pre-cleaning [step] is required.

**Claims:**

**[Kitchen] Sanitizer**

[Antibac] [Antibacterial]

All Purpose Cleaner

[Cleans] [shines] [sanitizes] [kitchen] [and/or] [household] surfaces [and/or] [fixtures] [throughout the [home] [house]

Kills [99.9%] of [Staphylococcus aureus][ Escherichia coli] [on hard, nonporous surfaces][in 30 seconds]

Kills [household] bacteria [and sanitizes without bleaching]

Kills 99.9% of [household] bacteria [in 30 seconds]

One step cleaning and sanitizing

**Storage and Disposal:** Non refillable container. Store airtight at room temperature. Do not reuse or refill this empty container. Offer empty container for recycling. If recycling is not available, discard in trash.

[optional language]

{note to agency}

**{Antibacterial Claims – OPTIONAL}**

Anti-Bac[terial]

[Antibacterial] kitchen cleaner

Bac Attack

Beat [Bac][Bacteria]

Bye-bye [bacteria]

Cleans as it kills [bacteria] [and sanitizes]

Cleans –or- shines –or- sanitizes kitchen –and/or- household surfaces –and/or- fixtures [throughout the home –or- house]

Kills [household] bacteria [and sanitizes without bleaching]

Kills 99.9% of [household] bacteria [in 30 seconds]

Kills [99.9%] of [bacteria] [Staphylococcus aureus][ Escherichia coli] [Staphylococcus aureus][Enterobacter aerogenes] ~~using no dirty ingredients~~

One step cleaning and sanitizing

[Easily] Clean[s] –and/or- sanitize [in][one easy step]

Bacteria Buster

Bacteria Jail

Bacteria Patrol

bacteria Police

bacteria Squad

bacteria Terminator

[Kills] [eliminates] [destroys] [wipes out] 99[.9]% of [household] [bacteria] ~~[naturally using plant]~~  
[naturally] derived ingredients

Tough on bacteria

[optional language]  
 {note to agency}

**{General Claims – OPTIONAL}**

[You deserve] A cleaner clean  
 [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  
 Sanitize without bleaching  
~~[Contains] No bleach~~  
~~[Contains] No Triclosan~~  
~~[Contains] No quaternary amines or quats~~  
~~[Contains] No petrochemicals~~  
 No harsh chemical smell  
 [Free of][no]dye and/or perfumes  
 Odorless  
 Made by and for the people against dirty  
~~[Naturally] [plant] [based] [derived]~~  
 Never tested on animals  
 No harsh fumes  
~~Plant derived ingredients~~  
 Psst: It's always a good idea to test in an inconspicuous place first  
 Wont' harm kitchen surfaces

**Packaging Claims:**

100% recycled bottle  
 [Innovative] [cool] [Sleek] [fun] [unique] design  
 Recycle [for good karma]  
 Bottle contains [PCR][post-consumer recycled plastic].

**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~~

**Sample Copy 1:**

There's a new antibac in town and ~~it's made with plant-derived ingredients~~ in a formula that's tough on grease and grime and [won't harm][easy on] surfaces . Plus you'll be happy to know that it kills 99.9% of 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 [sanitize][kill bacteria], we've got your back: anti-bac, that is. It's a [new] method ~~packed with plant-derived ingredients~~ that kill[s] [99.9% of] bacteria, all in a formula [that won't harm [any] surfaces][that's easy on surfaces][without [a] harsh smell[s]][that leaves nothing behind but a fresh scent and a smile]. BAM! Take that[dirty][bacteria].

[optional language]

{note to agency}

**Sample Copy 3:**

There's something to that whole killing me softly thing. So we say, kill all the bacteria you want, but do it [gently][the [method][easy]way][without harming surfaces]. Our [new] method kills [99.9% of] bacteria ~~with a plant-derived formula~~ that won't harm surfaces. It still cleans like heck and smells like heaven, so now when you put the hurt on bacteria, you can breathe easy about it.

**Sample Copy 4:**

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

**Fragrance Descriptors:**

go naked

[Free of][no]dye and/or perfumes

Unfragranced

citrus leaf

green melon

green fern

green leaf

watercress

laurel leaf

bamboo

ivy vine



[optional language]

{note to agency}

**TABLE 1**

**Use Sites:**











|  |   |  |
|--|---|--|
| <ul style="list-style-type: none"> <li>• Countertops</li> <li>• Tubs</li> <li>• Sinks [and fixtures]</li> <li>• Garbage cans</li> <li>• Stovetops</li> <li>• Showers</li> <li>• Shower<br/>[faucets][fixtures][walls]</li> </ul> | <ul style="list-style-type: none"> <li>• Chairs</li> <li>• Diaper pails</li> <li>• Doorknobs</li> <li>• Microwave oven[s]</li> <li>• Oven doors</li> <li>• Toilet[s] [exteriors]</li> <li>• Refrigerators</li> <li>• Stroller<br/>[Handles][Trays]</li> </ul> | <ul style="list-style-type: none"> <li>• Mirrors</li> <li>• Bathroom surfaces</li> <li>• High-chairs</li> <li>• Kitchen Surfaces</li> <li>• [Kitchen] Appliances</li> <li>• Ovens</li> <li>• Range hoods</li> <li>• Range tops</li> <li>• [Plastic] Cutting Boards</li> <li>• Food preparation surfaces</li> </ul> |
|--|---|--|

**Surfaces:**

|  |  |  |
|--|--|--|
| <ul style="list-style-type: none"> <li>• Aluminum</li> <li>• Glazed ceramic [tile]</li> <li>• Chrome</li> <li>• Corian</li> <li>• Enamel</li> <li>• Fiberglass</li> <li>• Formica</li> </ul> | <ul style="list-style-type: none"> <li>• Glass</li> <li>• Granite</li> <li>• Linoleum</li> <li>• Hard plastic</li> <li>• Glazed porcelain [tile]</li> <li>• Stainless steel</li> <li>• Synthetic marble</li> </ul> | <ul style="list-style-type: none"> <li>• Tile</li> <li>• Hard vinyl</li> </ul> <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> |
|--|--|--|

[optional language]  
 {note to agency}

| TABLE 2  |  |  |
|--|--|--|
| [Easily] removes[the following] –or–[easily] cleans[the following]   |  |  |
| Soils:   |  |  |
| <ul style="list-style-type: none"> <li>• Dirt</li> <li>• Grime</li> <li>• Hard water<br/>[marks][buildup][stains]</li> <li>• Soap [scum –or–<br/>buildup]</li> <li>• [Tough] Grease</li> </ul> |  |  |

| TABLE 3   |   |   |  |   |
|---|---|---|--|---|
| Representative Icons:   |   |   |  |   |
|   |   |   |   |   |
|  |  |  |  |  |