

75277-2

07-06-2011

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

JUL - 6 2011

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

J. Michael Kelley, PhD  
Authorized Representative for Method Products, Inc.  
**toXcel**  
Toxicology & Regulatory Affairs  
P.O. Box 363  
7140 Heritage Village Plaza  
Gainesville, VA 20156

Subject: **FREAK**  
EPA Registration No. 75277-2  
Application Date: February 7, 2011  
Receipt Date: February 8, 2011

Dear Dr. Kelley:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) 3 (c) 7 A as amended, is accepted.

**Proposed Amendment:**

- Add additional virucidal and bacterial claims to label

**Data Summary**

Data Requirement	Means of Support	Status
Influenza A virus	Submitted study, MRID 483825-04	Acceptable, RTU @ 10 min
Rhinovirus type 37	Submitted study, MRID 483825-05	Acceptable, RTU @ 10 min
Staphylococcus aureus	Submitted study, MRID 483825-01	Acceptable, RTU @ 10 min
Staphylococcus aureus	Submitted study, MRID 483825-02	Unacceptable
Staphylococcus aureus	Submitted study, MRID 483825-03	Acceptable, RTU @ 10 min contact time

**CONCURRENCES**

SYMBOL	Salmonella enterica	Submitted study, MRID 483825-03	Acceptable, RTU @ 10 min contact time				
SURNAME							
DATE							

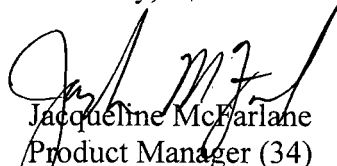
**General Comments**

A stamped label is enclosed. Submit a copy of your final printed label before distributing or selling the product.

Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3 (c) (5) and section 4 (a) when the Agency requires all registrants of similar products to submit such data.

Should you have any questions concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell-mcfarlane.jacqueline@epa.gov](mailto:campbell-mcfarlane.jacqueline@epa.gov) or Stacey Grigsby by telephone at (703) 305-6440 or by email at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) during the hours of 8:00 am to 4:00 pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,



Jacqueline McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

**CONCURRENCES**

SYMBOL							
SURNAME							
DATE							

[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. 75277-2  
EPA Est. No

Net Contents XX

**ACCEPTED**

**JUL - 6 2011**

Under the Federal Insecticide, Fungicide, and  
Rodenticide Act as amended, for the  
pesticide, registered under  
EPA Reg. No. **75277-2**

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

{Precautionary Statements: 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:** [Twist nozzle to on.] Spray surface [onto soils]—and- [rub][wipe][scrub]clean.

[optional language]

{note to agency}

**Sanitizing Instructions (Non-food Contact):**

To Sanitize Non-Food Contact Hard Non-Porous Surfaces: Spray until thoroughly wet. Let stand [for] 5 minutes [before wiping] [and 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 hard non-porous surfaces] –or- [sanitizes hard non-porous surfaces]-or- [to sanitize]. Spray [this product] on surface [until thoroughly wet]. Let stand –or-sit-or-leave for 1 minute. 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]

Multi-purpose cleaner

Multi-surface(s)

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 1 minute

Kills [household] bacteria [and sanitizes without bleaching]

Kills 99.9% of [household] bacteria [in 1 minute]

One step cleaning and sanitizing

**Storage and Disposal:** Nonrefillable 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}

#### Disinfecting Instructions:

To Disinfect: Spray [on surface][until thoroughly wet]. Let stand –or–leave for 10 minutes. Wipe [with [paper towel] –and/or–[microfiber][clean][dish] towel –and/or– [cloth]].

#### Claims:

Disinfect

[Easily] Clean[s][and/or][disinfect[s]] [in][one easy step]

Kills germs\* [- including] [*Staphylococcus aureus*] [Influenza A Flu Virus], [Rhinovirus] [*Salmonella enterica*]

#### Toilet Bowl Instructions:

{This section is for CSF alternate formulations 10 - 13}

#### Cleaning Instructions:

To Clean [and deodorize]: [Twist nozzle to on-or-twist to open.][Spray-or-squirt] [product][gel] under rim [and cover the inside of the toilet bowl evenly]. [Wait [10 minutes] for product to do its thing.][Brush. Flush.][Done.]

#### Sanitizing Instructions:

To kill [99.9% of] bacteria-or-To sanitize: Empty toilet bowl, spray-or-squirt [product][gel][under rim]to cover surface. Wait 5 minutes, then brush and flush. For heavily soiled areas a pre-cleaning step is required.

#### Disinfecting Instructions:

To disinfect: Empty toilet bowl [of water][and any other contents], spray-or-squirt[product][gel] to cover surface. Wait 10 minutes, [then brush and flush][Brush. Flush. Done]. For heavily soiled areas a pre-cleaning step is required.

\*[Specifically] [Kills] [Demonstrated to kill] *Staphylococcus aureus*, Influenza AFluVirus, Rhinovirus, *Escherichia coli*, *Enterobacter aerogenes*, and *Salmonella enterica*.

†Kills Rhinovirus, which is one the three viruses that may cause cold symptoms

[optional language]

{note to agency}

**{Antibacterial/Sanitizing/Disinfecting Claims – OPTIONAL}**

[Zap(s)][Zing(s)][Slams] 99.9% of [germs\*][bacteria]  
 Anti-Bac[terial]  
 [Antibacterial] kitchen cleaner  
 Bac Attack  
 Beat [Bac][Bacteria][Germs\*]  
 Bye-bye [bacteria][germs\*]  
 Cleans as it kills [[germs\*][bacteria]] [and sanitizes][and disinfects]  
 Cleans –or- shines –or- sanitizes-or-disinfects kitchen –and/or- household surfaces –and/or- fixtures  
 [throughout the home –or- house]  
 Kill [household] bacteria [and sanitizes without bleaching]  
 Kill [household] germs\* [and disinfects without bleaching]  
 Kills 99.9% of [household] bacteria [in 1 minute]  
 Kills [99.9%] of [bacteria] [*Staphylococcus aureus*] [*Escherichia coli*] [*Enterobacter aerogenes*]  
 One step cleaning and sanitizing  
 [Easily] [Clean[s]] –and/or- sanitize-or-disinfects [in][one easy step]  
 Bacteria Buster  
 Bacteria Jail  
 Bacteria Patrol  
 bacteria Police  
 bacteria Squad  
 bacteria Terminator  
 Germ\* Buster  
 Germ\* Jail  
 Germ\* Patrol  
 Germ\* Police  
 Germ\* Squad  
 Germ\* Terminator  
  
 [Kills] [eliminates] [destroys] [wipes out] 99[.9]% of [household] [germs\*] [bacteria]  
 Tough on bacteria  
 Tough on germs\*  
 Kills Influenza A [Flu] virus  
 Kills [a common] cold virus†  
 Kills Cold† & Flu Viruses  
 Kills viruses that cause a cold† & flu  
 Kills salmonella enterica  
 Disinfecting-or-Disinfectant-or-Sanitizing-or-Antibacterial [multi-purpose][multi-surface][all-  
 purpose][kitchen][bathroom]cleaner  
 Disinfecting-or-Disinfectant-or-Sanitizing-or-Antibacterial [toilet[bowl]cleaner][Toilet Stinker  
 Kicker][Toilet Tingle][Toilet Clean Team][Bowl Loo][Bowl Patrol][Loo [Love]  
 Scrub][Commode[Command][Cleanser]][Twinkle Toilet]

[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

Hello clean

Sanitize without bleaching

Disinfect-or- kill germs\* without bleaching

Kills germs\* without the bleach smell

A bleach alternative

Disinfect your bathroom without the bleach smell

No harsh chemical smell

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

Odorless

Made by and for the people against dirty

No harsh fumes

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

Won't harm kitchen surfaces

Removes soap scum

Removes hard water [stains][spots]

Soap Scum buster

A cleaner way to fight dirty

That's good karma.

The germ\* extinguisher

Think of this as your [personal] germ\* extinguisher

A new weapon that you can keep within reach with a [citrus-based][citric acid based]formula [and nature-inspired scents]

The [new] method [way] to fight dirty[germs] {NOTE: the term "new" will only be used for a period of 6 months from the time of agency approval}

Think of it as your [fresh-scented] micro-ninja

A kiss of death for [99.9% of] germs\*

For the love of clean

Bleach-free soap scum buster

Kills germs\* with citrus

Made with citrate [sugars][salts]

[Made with] citric acid derived from sugars

[Made with] citric acid fermented from plant sources

Kills germs\* with citrate [sugars][salts]

Kills germs\* with citric acid

Citric acid made from a biological process

Biologically produced

Sustainable solution to cleaning and disinfection

Method [solution] to cleaning and disinfection

Zap germs\*-or-bacteria and clean up.

**Packaging Claims:**

100% recycled bottle

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

Recycle [for good karma]

[optional language]

{note to agency}

Bottle contains [PCR][post-consumer recycled plastic].

This bottle is made [with love] from [100%][XX%] recycled plastic-or-PCR.

#### Sample Copy 1:

There's a new antibac in town and its made with 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-or-germs\*, leaving nothing behind but a fresh scent and a smile. That's a cleaner clean. [For the love of 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 that kill[s] [99.9% of] bacteria-or-germs\*, 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][germs].

#### Sample Copy 3:

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

Bathrooms are notorious hiding places for dirt and germs.

Now you can [flush out][eliminate]the offenders[without getting caught in the crossfire].

Our [antibacterial][sanitizing][disinfecting] bathroom cleaner, [powered by][using][citrus][citric acid].

[kills 99.9% of][household][bacteria][germs\*][while] shows mercy on your hard, non-porous] surfaces.

It's a benevolent clean.

Bathrooms get a bad rap.

From bathroom-specific stink to the potent cleaners used to combat them, it can [feel][seem] like rather [cheerless][unwelcome] territory.

But it doesn't have to be that way.

[Now you can] eliminate dirt, germs\* + the accompanying odors with our

[antibacterial][disinfecting][sanitizing] bathroom cleaner, powered by natural ingredients

[No breath-holding necessary].

Thankfully, we have you covered with a disinfecting toilet bowl cleaner that depends on [ingredients like] citric acid to eliminate bacteria and dirt.

So after a good, clean scrub, the only thing left will be the reassuring reflection of your bum coming in for landing.

You don't have to replace one unpleasant odor with another in the name of clean.

Your toilet—and your olfactory system—deserves better.

Give your bathroom a disinfecting[jolt][shock][blast] with a toilet bowl cleaner that uses [pleasantly scented] natural ingredients like citric acid to purge dirt and [kill] germs\*-or-bacteria.

Your nose hairs will thank you.

We're getting bathroom duty off the chore blacklist with a toilet bowl cleaner that depends on citric acid to eliminate grime.



[optional language]

{note to agency}

Citric acid [dissolves][destroys][kills] 99.9% of bacteria + germs\* while you scrub.

Which means that the next time you're bowing down to the porcelain gods, any gagging will be strictly due to whatever ails you, rather than a chemical plume.

All for the love of clean.

This product-or-Citric acid[dissolves][destroys][kills] 99.9% of bacteria-or-germs\* while you scrub.

Which means that the next time you find yourself with some time to kill while on the toilet, you can practice your yoga breathing.

Removes tough stains from you know what

**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>• Basins</li> <li>• Faucets</li> <li>• Floors</li> <li>• Hand Rails</li> <li>• Garbage cans</li> <li>• Stovetops</li> <li>• Showers</li> <li>• Shower [faucets][fixtures][walls][doors]</li> </ul>	<ul style="list-style-type: none"> <li>• Chairs</li> <li>• Diaper pails (tables)</li> <li>• Doorknobs</li> <li>• Microwave oven[s]</li> <li>• Oven doors</li> <li>• Toilet[s] [exteriors]</li> <li>• Toilet Bowl(s)</li> <li>• Toilet Seats</li> <li>• (whole)(entire) toilet</li> <li>• Under the (toilet) rim</li> <li>• Tubs</li> <li>• Urinals</li> <li>• Walls</li> <li>• Refrigerators</li> <li>• Stroller [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>
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**Surfaces:**

For use on the following hard surfaces [and prized possessions]:

Spray with confidence on the following surfaces:

Zap germs\*-or-bacteria [dead][gone] on [these][the following] surfaces:

Zap germs\*-or-bacteria and clean up. Suitable for most non-porous surfaces:

<ul style="list-style-type: none"> <li>• Aluminum</li> <li>• Glazed ceramic [tile]</li> <li>• Chrome</li> <li>• Corian</li> <li>• Baked Enamel</li> <li>• Sealed Fiberglass</li> <li>• Formica</li> </ul>	<ul style="list-style-type: none"> <li>• Glass</li> <li>• Sealed 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>• Glazed 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>
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[optional language]

{note to agency}

**TABLE 2**

**[Easily] removes [the following] –or–[easily] cleans[the following]–or– use to clean**

**Soils:**

<ul style="list-style-type: none"><li>• Dirt</li><li>• Grime</li><li>• Hard water [marks][buildup][stains]</li><li>• Soap [scum –or– buildup]</li><li>• [Tough] Grease</li><li>• limescale</li><li>• mold and mildew [stains][spots]</li></ul>	<ul style="list-style-type: none"><li>• fingerprints</li><li>• toothpaste</li><li>• [urine-or-pee pee] stains</li><li>• [fecal-or-poop-poo poo] stains</li><li>• body wash</li><li>• shaving cream</li><li>• shampoo</li><li>• hair gel</li><li>• cosmetics</li><li>• lotion</li></ul>
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[optional language]  
{note to agency}

# **Germ-Talk**

"What about my feelings?"

"Citric acid is my new nemesis."

"I don't like this one bit."

"I've officially met my match."

"I'll never understand clean."

"What have I ever done to you? Okay, beside that debilitating cold last winter."

"You think you're so smart, don't you? Well...you are, okay?. You win."

"How could you do this to me? I thought we had something special."

"Is it because of the way I smell?"

"I can change. Please, give me another chance!"

"I surrender."

"So this is how it feels to be unwanted."

"Flu season, schmu season."

"Kicking germs\* and taking names, huh?"

"What's your name? I'm contagious."

"I'm not happy to report that this kills 99.9% of [household] germs\*. That's bad news for me."

"Kills 99.9% of [household] germs\*. Oh, great."

Selected "**Germ-Talk**"  
statements (above) will  
be positioned in this  
dialogue box

