

75277-2

11/01/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV - 1 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

Subject: Freak
EPA Registration Number: 75277-2
Application Date: August 3, 2011
Application Receipt: August 3, 2011

Dear Dr. Kelley:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

Proposed Amendment:

- Adding 9 new alternate formulations
- Remove food contact sanitizing claims

Conditions

Revise the label as follows:

- 1) Revise the 30th claim on page 5 to read "Kills germs* with *citric acid*."
- 2) Revise the 31st and 34th claims on page 5 by deleting the terms, "[sugars][salts]" because the reference is an implied safety claim.
- 3) Delete the 33rd, 36th, 37th, and 38th claims on page 5 because they are implied safety claims.
- 4) Revise the 5th and 6th paragraphs on page 6 by deleting the phrases, "powered by natural ingredient" and "natural ingredients" because they are implied safety claims.
- 5) Since this product does not support food contact sanitizing claims and directions, the following food contact surfaces on page 8 must be revised to read "microwave oven *exteriors*," refrigerator *exteriors*," and kitchen appliance *exteriors*."

General Comments:

The Confidential Statements of Formula for the alternate formulations 14-22 are acceptable. They are in compliance with the label and PR Notice 91-2.

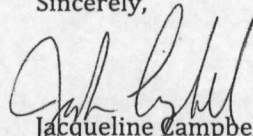
A stamped copy of the label accepted with conditions is enclosed. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

If you have questions concerning this letter, then please contact me at 703-308-6416 or by email at campbell-mcfarlane.jacqueline@epa.gov or Killian Swift at 703-308-6346 or by email at swift.killian@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,



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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

[optional language]
{note to agency}

ACCEPTED
with COMMENTS
EPA Letter Dated:

NOV 1 2011

FREAK

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
and/or, for the purpose of
being used under EPA Reg. No.

Hard surface disinfectant and/or sanitizer

75277-2

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

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"> • Countertops • Tubs • Sinks [and fixtures] • Basins • Faucets • Floors • Hand Rails • Garbage cans • Stovetops • Showers • Shower [faucets][fixtures][walls][doors] 	<ul style="list-style-type: none"> • Chairs • Diaper pails (tables) • Doorknobs • Microwave oven[s] • Oven doors • Toilet[s] [exteriors] • Toilet Bowl(s) • Toilet Seats • (whole)(entire) toilet • Under the (toilet) rim • Tubs • Urinals • Walls • Refrigerators • Stroller [Handles][Trays] 	<ul style="list-style-type: none"> • Mirrors • Bathroom surfaces • High-chairs • Kitchen Surfaces • [Kitchen] Appliances • Ovens • Range hoods • Range tops • Plastic Cutting Boards • Food preparation surfaces
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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"> • Aluminum • Glazed ceramic [tile] • Chrome • Corian • Baked Enamel • Sealed Fiberglass • Formica 	<ul style="list-style-type: none"> • Glass • Sealed Granite • Linoleum • Hard plastic • Glazed porcelain [tile] • Stainless steel • 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>
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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">• Dirt• Grime• Hard water [marks][buildup][stains]• Soap [scum –or– buildup]• [Tough] Grease• limescale• mold and mildew [stains][spots]	<ul style="list-style-type: none">• fingerprints• toothpaste• [urine-or-pee pee] stains• [fecal-or-poopy-poo poo] stains• body wash• shaving cream• shampoo• hair gel• cosmetics• lotion
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[optional language]
{note to agency}

12/12

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

