



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 26, 2016

Earl Goad, Authorized Representative for Method Products
c/o Toxcel
7140 Heritage Village Plaza
Gainesville, VA 20155

Subject: Notification per PRN 98-10 – Adding scent descriptors
Product Name: Freak
EPA Registration Number: 75277-2
Application Date: May 6, 2016
Decision Number: 517418

Dear Earl:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact Tom Luminello at (703) 308-8075 or via email at luminello.tom@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Tom Luminello". To the right of the signature is the word "for" in a smaller font.

Jacquie Hardy, Product Manager 34
Regulatory Management Branch II
Antimicrobials Division (7510-P)

[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

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.

NOTIFICATION

75277-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

April 22, 2016

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05/26/2016

[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

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

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*]

[optional language]

{note to agency}

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 citric acid

Made with citrate

[Made with] citric acid

[Made with] citric acid

Kills germs* with citrate

Kills germs* with citric acid

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]

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

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

[optional language]

{note to agency}

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

[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] 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.

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

[optional language]

{note to agency}

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

spearmint

wildflower

citron

tangelo

[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] exteriors• Oven doors• Toilet[s] [exteriors]• Toilet Bowl(s)• Toilet Seats• (whole)(entire) toilet• Under the (toilet) rim• Tubs• Urinals• Walls• Refrigerator exteriors• Stroller [Handles][Trays]	<ul style="list-style-type: none">• Mirrors• Bathroom surfaces• High-chairs• Kitchen Surfaces• [Kitchen] Appliance Exteriors• Ovens• Range hoods• Range tops
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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• 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 stone, 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]-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}

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

