

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

Keller And Heckman, LLC
c/o Innovasource, LLC
1001 G Street, N.W.
Suite 500 West
Washington, D. C. 20001

AUG 16 2010

Attention: Michael T. Novak
Regulatory Counsel

Subject: Detergent Disinfectant Pump Spray
EPA Registration No. 85837-1
Amendment Dated July 21, 2010

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Revised Label in response to Efficacy Review Dated July 1, 2010

Conditions

On the company's cover letter dated July 21, 2010, item #2, the company has agreed to submit data for the mildewstat claim. EPA will conditionally allow this claim to remain on the label provided that the company will submit the data within 6 months of the date of this letter.

On the company's cover letter dated July 21, 2010, item #8, the claim "Ingredients you trust" must be changed to read: "Ingredients you can trust".

On the proposed label, page 2 of 13, delete "no rinsing is required, except on direct food contact surfaces when require a potable water rinse after treatment". Use of this product on food contact surface requires a food tolerance clearance or an exemption from tolerance. The restriction statement "No to use on food contact surfaces must be placed on the label wherever it applies.

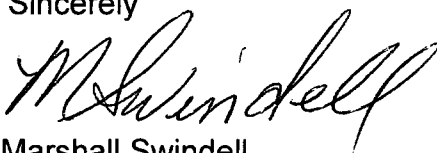
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General Comments

Submit two (2) copies of the final printed label for our review. A stamped copy of the "accepted" product labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely



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

Enclosure

MASTER LABEL

DETERGENT DISINFECTANT PUMP SPRAY

{This is the product name approved by the EPA for the formula}

Additional Brand Names:

- PROXI® HOME Bathroom Disinfectant Cleaner
- PROXI® HOME Kitchen Disinfectant Cleaner
- PROXI® HOME Multi-Purpose Disinfectant Cleaner

- CLEANER
- DEODORIZER
- DISINFECTANT
- MILDEWSTAT (on hard inanimate surfaces)
- FUNGICIDE (against pathogenic fungi)
- [PROXI®] [PROXI® home]
- Bactericidal
- Bathroom Disinfectant Cleaner
- Multi-Purpose Disinfectant Cleaner
- All-Purpose Disinfectant Cleaner
- [Orange Scent] [Lemon Scent] [Fresh Scent] [Citrus Scent], [Unscented], [Fresh Clean Scent] [Light Clean Scent] [Light Fresh Scent] [Herbal Fresh Scent] [Green Apple] [Green Apple & Pear Scent]
- [Fresh clean scent] [Light clean scent] [Light fresh scent]
- Ready-to-Use (RTU or R-T-U) Disinfectant Spray
- Eliminates Odors
- [Cleans and Deodorizes]
- Cuts (Tough) Grease and Grime (without Scrubbing)
- Kills [99.9%] of germs* [viruses**]
- Kills 99.9% of Bacteria
- Kills 99.9% of Household Bacteria
- For Use in Animal Housing Facilities [Public Restrooms (as a Non-Acid Bowl & Bathroom) Disinfectant Cleaner]
- Stabilized Hydrogen Peroxide Technology
- Disinfects with [Hydrogen Peroxide] [H2O2]
- Kills germs*
- Kills Influenza A [flu] virus
- Kills H1N1 [virus]
- Antibacterial
- Kills [Salmonella^], [Staph^], [E. coli^], [Pseudomonas^]
- [Prevents] [Reduces risk of] cross-contamination
- Cuts tough grease and grime
- Clean you expect. Ingredients you trust.
- Biodegradable cleaning agents
- [New!]
-
-

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with COMMENTS
EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 86837-1

ACTIVE INGREDIENTS

H2O2	6.00%
INERT INGREDIENTS.....	94.00%
Total	100.000%

KEEP OUT OF REACH OF CHILDREN
CAUTION

4
15

MASTER LABEL

See side (back) panels for additional precautionary statements.

EPA REG. NO. 85837-1

EPA EST. NO.

NET CONTENTS

U.S. Patent No.

Manufactured [Mfd] [For] [By] Innovasource [LLC]
11515 Vanstory Drive, Suite 110
Huntersville, NC 28078
[Batch number]

Detergent Disinfectant Pump Spray (PROXI® (multi-purpose) (kitchen) (bathroom) disinfectant cleaner (or this product or product name) is designed specifically as a general (non-acid) (ready-to-use) (non-abrasive) cleaner and disinfectant for use in homes, hospitals, nursing homes, patient rooms, operating rooms, ICU areas, shower rooms, locker rooms, public restrooms, schools, food processing plants, food service establishments (restaurants) (commercial kitchens), transportation terminals, office buildings, manufacturing facilities, lodging establishments, retail businesses, veterinary clinics, pet shops, animal life science laboratories and athlete/recreational facilities where housekeeping is of prime importance in controlling the hazard of cross contamination. It is formulated to disinfect hard, non-porous, inanimate environmental surfaces: floors, walls, metal surfaces, stainless steel surfaces, glazed porcelain, glazed ceramic tile, plastic surfaces, chrome, copper, laminated surfaces, baked enamel surfaces, bathrooms, shower stalls, bathtubs and cabinets. **For plastic and painted surfaces, spot test on an inconspicuous area before use.** [No rinsing is required, except on direct food contact surfaces which require a potable water rinse after treatment.] In addition, (this product or product name) deodorizes those areas that generally are hard to keep fresh smelling, such as garbage storage areas, empty garbage bins and cans, basements, restrooms and other areas which are prone to odors caused by microorganisms. [Not for use on food contact surfaces.]

<<Back panel --- Organism information for qualified claims

Kills Germs*

Kills Viruses**

- Influenza A (H1N1) virus

Kills Bacteria^

- *Salmonella enterica* (*Salmonella*)
- (*Staphylococcus aureus*) (*Staph*)
- (*Escherichia coli*) (*E. coli*)
- *Listeria monocytogenes*
- (*Pseudomonas aeruginosa*) (*Pseudomonas*)

Kills Fungi^^

- *Trichophyton mentagrophytes* (Athlete's Foot Fungus)

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<< Front or back panel-----Marketing/Product performance claims

(3-in-1) (4-in-1) (All-in-1) (Antibacterial) (Multi-Action) (Multi-Purpose) (Triple Action) (Versatile)
(Bathroom) (Floor) (Glass & Surface) (Kitchen) (Restroom) (Cleaner) (Cleaning) (Disinfectant)

A disinfecting, effective (non-food contact surface) cleaner for use in the (kitchen) (bathroom) (washroom)
(restroom) (and other household areas)
America's Home Disinfectant

MASTER LABEL

An effective (cleaner) (disinfectant) on non-food contact surfaces in the (insert use sites).
 Antibacterial Action
 Biodegradable surfactants
 Biodegradable cleaning agents
 Botanically-derived ingredients
 Botanically sourced surfactants
 Bleach free
 Clean you expect
 Clean without compromise
 Cleans powerfully and naturally
 Combines streak-free cleaning with antibacterial action.
 Contains no (phosphates) (abrasives) (bleach) (or harsh acids).
 Contains non-VOC-emitting ingredients.
 Contains powerful grease cutters
 Convenient (bathroom) (restroom) (kitchen) (floor) (surface) (cleaner)
 Cuts cleaning time
 Easy to use (formula) (formulation) (refill)
 Economical refill
 Economy (Great) (Mega) (Super) (Trial) (Value) (Size) (Refill)
 Effectively works on many hard, non-porous surfaces
 Encourage your local authorities to establish a program to recycle this (bottle) (container).
 Fast/Easy/Effective: Use (in) (on) (the) {insert use sites}.
 For a cleaner, fresher household
 For most hard, non-porous surface where germs* are a concern
 For everyday use
 For multiple cleaning tasks
 For use (in) (on) {insert use sites} (as a multi-purpose disinfectant cleaner)
 Formulated for (hospital) (institutional) use
 Formulated for medical institution's (infection control program) needs
 Good (for everyday cleaning) (and) (for your toughest (household) (kitchen) (bathroom) messes
 Good for most indoor and outdoor cleaning tasks
 Great for everyday use (in kitchens and) (bathrooms) (restrooms) (all over your house)
 Great for (kitchens) (bathrooms) (most indoor and outdoor cleaning tasks) (your toughest household messes)
 Help protect your family from germs* with PROXI® Brand Disinfectant products.
 High (cleaning) performance
 Hospital type disinfection
 Ingredients you trust
 [Ingredients: water, hydrogen peroxide, fatty alcohol ethoxynate, ammonium methyl sulfate, sodium octanesulfonate, sodium sulfate, isopropanol, fragrance), polysorbate 20, phosphoric acid]
 Important facts (about this product)
 Keep your (shower) (kitchen) (bathroom) (restroom) clean every day
 Leaves (a fresh, clean scent) (no (dull) (sticky) residue)
 Leaves (household) (washroom) (restroom) surfaces (clean) (deodorized)
 Leaves no (filmy) (sticky) residue
 Leaves your (home) (house) (washroom) (restroom) (facility) smelling clean with a clean fresh scent
 Makes your (cleaning) job easier (in the) (kitchen) (bathroom) (restroom) (washroom) (household) (all over the house)
 Meets AOAC Germicidal Spray Products efficacy test standards for hospital disinfectants
 No bleach
 No phosphates
 No rinse required
 No streaking (or filming)
 Non-abrasive formula (will not scratch surfaces)
 Oxygenated cleaning and deodorizing
 Perfect for the kitchen (and) (bathroom) (restroom)
 Power of Peroxide, PROXI®
 Phosphate free
 Powerful [Quick & Easy] [Cleaning] [Cleaner]
 Powers through your toughest cleaning jobs

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 Fungicide, and Rodenticide Act as
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 registered under EPA Reg. No. 85837-1**

MASTER LABEL

Products that perform
 Ready to use
 Removes food stains and helps eliminate odors
 Stabilized hydrogen peroxide technology
 Starts to work before you do
 (Still) great for kitchens (and) (bathrooms) (restrooms)
 Streak-free (formula) (shine)
 The most convenient way to clean
 The smell of [PROXI®], [product name] clean
 This [bottle] [container] is made of x% post-consumer recycled plastic
 Tough on greasy soils
 Tough on messes; easy on you
 Use only one product to get a streak-free shine plus antibacterial action
 Without bleach
 Without phosphates
 Works on a wide range of (household) (kitchen) (bathroom) surfaces

<< Front or back panel----- Cleaning claims

Antibacterial cleaning action (on hard, non-porous surfaces) for (kitchens and bathrooms) (all over the house) (washrooms) (restrooms) (all over the facility)
 Antibacterial glass and surface cleaner
 Brilliant (bright) (glistening) (see-through) (beautiful) shine
 Bleach free
 Cleans
 Cleans (hard, non-porous surfaces) (throughout the home) (in the kitchen) (in bathrooms)
 Cleans (hard, non-porous surfaces) (throughout the home) (kitchens) (bathrooms)
 Cleans and disinfects hard, non-porous surfaces (throughout the home) (in the kitchen) (in bathrooms)
 Cleans and shines
 Cleans non-food contact surfaces
 Cleans (fast) (all over the house) (in kitchens and) (bathrooms) (restrooms)
 Cleans (kitchen) (bathroom) (floor) surfaces to a streak-free shine
 Cleans (tough) grease and grime
 Cleans (disinfects) (removes offensive odors from) {insert use sites}
 Cleans (eliminates) stubborn (nasty) stains
 Cleans everyday kitchen and bathroom messes
 Cleans everyday (tough) (kitchen) (and) (bathroom) (washroom) (restroom) messes (fast)
 Cleans (surfaces) (throughout the) (house) (kitchen) (bathroom) (and other household surfaces)
 Cleans (surfaces) (throughout the) (kitchen) (restroom) (and other (public) facility surfaces)
 Cleans the toughest soils
 Cleans to a brilliant shine
 Cleans to a streak-free shine
 Cleans tough messes fast
 Cleans tough soap scum
 Cleans without bleaching
 Cleans without leaving a dull residue behind
 Confidence in cleaning
 Contains (powerful) (effective) (fast acting) grease cutters
 Cuts (Cleans) (Controls) (Dissolves) grease (fast) (quickly)
 Cuts (Cleans) greasy dirt and soap scum and bathroom soils
 Cuts (Cleans) grime in kitchens and (bathroom) (restrooms) (fast)
 Cuts (Cleans) kitchen and bathroom and household grime and soils (fast)
 Cuts cleaning time
 Cuts grease
 Cuts grease and grime
 Cuts through grease and grime
 Cuts through tough kitchen (and) (bathroom) (restroom) (grease) (grime) and soils

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**Under the Federal Insecticide,
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MASTER LABEL

Cuts through (tough) (grease) (grime) (and messes)
 Cuts (tough) (kitchen) grease and grime
 Degreases (Degreaser)
 Degreases and deodorizes
 Destroys (Cuts) (Powers through) (Removes) (tough) grease (and grime)
 Destroys (Eradicates) (Powers away) (Powers through) (cleans) (wipes away) (removes) (tough (on) grease and grime
 Effective – cleans soap scum and prevents mold and mildew stains
 Effortlessly removes stubborn (nasty) stains
 Eliminates grease without streaking
 Eliminates tough (kitchen) grease and grime
 For a beautiful streak-free shine, just spray and wipe clean with a (paper towel) (cloth)
 Gives you multiple cleaning actions – removes dirt, grease and soap scum
 Gives you streak-free cleaning (rinse direct food contact surfaces after treatment with a potable water rinse) (on most non-food contact kitchen surfaces))
 Gives you streak-free shine while it cleans
 Gives you the power of specialty cleaners in one bottle
 Glass and surface cleaner with antibacterial formula
 Great on glass
 Helps eliminate odors
 Just (squeeze) (spray) (mop) (wipe)
 No mix (cleaner) (cleaning)
 Non-food contact surface cleaner
 Phosphate free
 Powerful (fast acting) (effective) (all) (multi-) purpose cleaner (degreaser and deodorizer)
 Powers through (Eliminates) (Destroys) (tough) grease (and grime)
 Powers through even your toughest messes in the kitchen and bathroom
 Powers through tough messes (all over the house including kitchen grease and grime) (bathroom soils such as soap scum)
 Quickly degreases and deodorizes
 Quickly (Destroys) stubborn (nasty) stains
 Quickly (Effortlessly) removes (cleans) the following: {insert soils}
 Removes (Cleans) the following: {insert soils}
 Removes food stains
 Sparkling shine
 Starts cleaning on contact
 Streak-free cleaning
 Streak-free shine
 Surface cleaner
 (This product's formula) cleans and shines
 Wipes away everyday grease and grime
 With daily use, (this product) will keep your shower clean

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<< Front or back panel----- Disinfecting & Deodorizing claims

Antibacterial) (Antibacterial Action) (Bactericidal) (Bactericide) (Deodorizer) (Deodorizes) (Disinfectant)
 (Disinfects) (Fungicidal) (Fungistat) (Fungistatic) (Germicidal*) (Virucidal**)

A disinfecting (non-food contact surface) cleaner for use in {insert use sites}
 Cleans and disinfects (all over the house) (kitchens) (bathrooms) (restrooms)
 Cleans and disinfects
 Cleans and disinfects
 - Insert 'A-B-C-D' organisms
 Cleans and disinfects in one (easy) step against
 - Insert 'A-B' organisms
 Cleans and disinfects in one (easy) step
 - Insert 'A-B' organisms
 Controls (Eliminates) (kitchen) odors caused by (bacteria) (germs*) (mold) (and mildew)
 Controls (Prevents) (cleans and prevents) mold and mildew (stains)

MASTER LABEL

Controls (Prevents) the growth of (fungi) and (mold)
Disinfects (Deodorizes) (while you clean)
Disinfects (Deodorizes) hard, non-porous surfaces
Disinfects in one easy step against:

Insert 'A-B' organisms

Disinfects as it cleans

No pre-cleaning needed

One-step cleaning

Single-step cleaning

use clean Disinfects – kills germs--use for deep cleaning

Eliminates bacteria from (kitchen) (bathroom) (washroom) (restroom) surfaces

Eliminates food odors (like garlic) left behind (on non food contact food surfaces) (after cooking)

Eliminates odors

Eliminates odors caused by bacteria (and non-fresh foods)

Eliminates odors caused by bacteria (mold) (mildew) (and) (non-fresh foods)

Eliminates (kills) odor-causing (bacteria) (germs*)

Help protect your family from cross-contamination of germs* (on hard, non-porous surfaces) (with

PROXI® , (product name) Brand Disinfectant products)

Kills bacteria

Kills bacteria commonly found in the (kitchen) (bathroom)

Kills germs*

(Effective against) (Disinfects against) 99.9% of germs*

Kills viruses**

Eliminates bacteria

Antibacterial

Kills household germs*

(Kills) (Effective against) (Disinfects against) the flu virus

(Kills) (Effective against) (Disinfects against) Influenza A

(Kills) (Effective against) (Disinfects against) H1N1

(Kills) (Effective against) (Disinfects against) (*Salmonella enterica*) (*Salmonella*^)

(Kills) (Effective against) (Disinfects against) (*Staphylococcus aureus*) (*Staph*^)

(Kills) (Effective against) (Disinfects against) (*Escherichia coli*) (*E. coli*^)

(Kills) (Effective against) (Disinfects against) *Listeria monocytogenes*

(Kills) (Effective against) (Disinfects against) (*Pseudomonas aeruginosa*) (*Pseudomonas*^)

(Kills) (Effective against) (Disinfects against) *Trichophyton mentagrophytes* (Athlete's Foot Fungus)

Kills germs* and controls the spread (and) (growth) of (fungi) (and) (mold)

Kills germs* that (kitchen) (bathroom) (ordinary) (ordinary, non-disinfecting) cleaners do not

Kills germs* while it cleans Kills household bacteria

Kills the following (household) fungi (in 10 minutes) (commonly found inside the bathroom)

Insert 'C' Organisms

Kills the following (household) organisms (in 10 minutes) (commonly found inside the home)

Insert 'A-B-C-D' Organisms

Kills the following (household) viruses (in 10 minutes) (commonly found inside the home)

Insert 'B' Organisms

Kills the following (household) bacteria (in 10 minutes) (commonly found in kitchens)

Insert 'A' Organisms

Kills (household) bacteria (without bleaching)

Kills odor-causing bacteria

Kills odor-causing bacteria in the kitchen (bathroom) (restroom) (washroom)

Kills odor-causing germs*

Kills odor-causing (household) bacteria and mold and mildew in damp, musty places

Kills the following:

Insert 'A-B-C-D'

Kills (Destroys) (Eliminates) germs* (that a)(bathroom)(kitchen)(ordinary) (cleaner does not)

Kills (destroys) (eliminates) germs* while it cleans

Kills (Disinfects) against in one step: {insert 'A-B' organism}

Kills (Eliminates) odor-causing bacteria in the (kitchen) (bathroom) (restroom) (all around the house)

Kills (kitchen) (bathroom) (household) germs* Kills (more than) (greater than) 99.9% of (household) organisms

Kills {insert 'A-B-C-D' organisms} in 10 minutes.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85837-1

MASTER LABEL

Kills {insert 'A-D' organism} commonly found in kitchens (in 10 minutes)
Kills {insert 'A-B-C-D' organism} commonly found around the house (in 10 minutes)
Kills {insert 'C' organism} commonly found in bathrooms (in 10 minutes)
Kills {insert 'A-B-C-D' organisms} on hard, non-porous (kitchen) (bathroom) (restroom) (household) surfaces in 10 minutes

(Prevents) (Reduces risk of) cross-contamination
Quickly (eliminates) (removes) (food) odors
Removes (Eliminates) (nasty) (foul) (filthy) (lingering) odors
Removes tough odors from (pets) (smoke) (cooking)

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

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Organism Reference Table

Category	Contact time	One-step	C – Common Household Fungus
A- Bacteria	10 minutes	yes	<i>Salmonella</i> [^] <i>Staph</i> [^] <i>E. coli</i> [^] <i>Pseudomonas</i> [^]
B- Virus	10 minutes	Yes	Influenza A (H1N1) virus
C - Fungi	10 minutes	No	<i>Trichophyton mentagrophytes</i> (Athlete's Foot Fungus)
D- Bacteria	10 minutes	No	<i>Listeria monocytogenes</i>

under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 858371

(This product) is a broad spectrum disinfectant (bactericidal) according to the AOAC Germicidal Spray Products test method.

(This product) is a combination cleaner/disinfectant that provides hospital disinfection on (washroom) (restroom) (and other) hard, non-porous surfaces.

(This product) is germicidal when used as directed for disinfection of non-food contact surfaces

(This product) is a versatile and convenient disinfectant cleaner for most washable hard, non-porous surfaces.

(This product) is highly versatile and a convenient disinfectant cleaner that you use straight from the bottle.

(Additional Claims, Uses & Applications):

- When used as directed, (this product or product name) (is) effective against a wide variety (broad-spectrum) of pathogenic microorganisms (including bacteria, viruses**, fungi, mold and mildew.)
- (This product or product name) is a germicidal (disinfectant) cleaner and deodorant (odor-counteractant) (odor neutralizer) designed for general cleaning, (and) disinfecting (deodorizing) (and controlling mold and mildew on) (of) hard, non-porous inanimate surfaces. Quickly removes dirt, grime, mold, mildew, food residue, blood and other organic matter commonly found in hospitals (in health care facilities) (on medical surfaces). It (also) eliminates odors leaving (restroom) surfaces smelling clean and fresh. Use where odors are a problem.
- **Animal Housing Facilities:** (This product or product name) removes dirt, grime, mold, mildew, blood, urine, fecal matter and other common soils found in animal housing facilities, grooming facilities, kennels, pet stores, veterinary clinics, laboratories or other small animal facilities. It (also) eliminates odors leaving surfaces smelling clean and fresh.
- It cleans, disinfects and deodorizes hard, non-porous inanimate surfaces. Its non-abrasive formula is designed for use on (Use daily on) (Use daily to clean and disinfect) hard, non-porous inanimate surfaces: plated or stainless steel, aluminum, chrome, glazed porcelain, glazed tile, laminated surfaces associated with floors, walls, countertops, cages, crates, kennels and animal equipment found in animal housing facilities.
- **Public Restrooms:** (This product or product name) is a disinfectant cleaner and deodorant (odor-counteractant) (odor-neutralizer) designed for general cleaning, (and) (disinfecting) (deodorizing) (and controlling mold and mildew) on hard, non-porous inanimate surfaces.

MASTER LABEL

- It cleans, disinfects and deodorizes surfaces by killing odor-causing microorganisms and prevents (inhibits) (controls) the growth of mold and mildew. Its non-abrasive formula is designed for use on (restroom surfaces): glazed ceramic (restroom surfaces), glazed porcelain, chrome, stainless steel and plastic surfaces associated with floors, walls, fixtures, toilets, urinals, sinks, shower rooms and locker rooms.
- **Non-Acid Bowl (& Bathroom) Disinfectant Cleaner:** (This product or product name) is (also) a (ready-to-use) non-acid (bowl and) bathroom cleaner that cleans, disinfects and deodorizes. It cleans, disinfects and deodorizes toilet bowls, urinals, rims, sinks, sink basins, faucets, tubs, glazed tiles, glazed ceramic, glazed porcelain, chrome, stainless steel and all non-porous inanimate surfaces found in the bathroom (restroom).
- It eliminates odors, leaving bathrooms (restrooms) smelling clean and fresh. Use where odors are a problem. It cleans, disinfects and deodorizes surfaces by killing odor-causing microorganisms and prevents (inhibits) (controls) the growth of mold and mildew. Its non-abrasive formula is designed for use (Use it daily) on (restroom surfaces): glass, glazed ceramic (restroom surfaces), glazed tile, glazed porcelain, chrome, stainless steel and plastic surfaces associated with floors, walls, fixtures, toilets, urinals, sinks, shower rooms and locker rooms.
- **Deck Wash and Cleaner:** (This product or product name) is (also) a ready to use cleaner for outdoor decks and patio surfaces to clean without harming nearby shrubs and grass

DIRECTIONS FOR USE

ACCEPTED
with **COMMENTS**
EPA Letter Dated:

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

AUG 16 2010

(For labels that list medical premises and metal and/or stainless steel surfaces, one of the following statements must be used.)

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 bloodstream, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the skin and does not enter normally sterile areas of the body.

Or

This product is not for use on critical or semi-critical medical device surfaces.

Repealed the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 85837-1

(Optional Directions for Product Supplied in Refill Bottles)

Fill or refill the X ounces. (This product or product name) spray bottle with (this product or product name) refill. Pour product into spray bottle over sink or tub basin.

DISINFECTION, DEODORIZING AND CLEANING – Remove gross filth or heavy soil prior to application of the product. Hold container six to eight inches from surface to be treated. Spray area until it is covered with the solution. Allow product to penetrate and the surface to remain wet for **10 minutes**: No scrubbing is necessary. Wipe off with a clean cloth, mop or sponge. The product will not leave grit or soap scum.

Disinfection of toilet bowls and urinals: Remove water from bowl by forcing water over trap with a swab mop applicator. Press swab mop against side of the bowl to remove excess from applicator. Apply 1 to 2 ounces of (this product or product name) evenly, allowing sufficient time for product to cover entire surface of bowl for maximum cleaning. Swab bowl completely using a scrub brush or toilet mop, making sure to get under the rim. Let stand for **10 minutes**.

To disinfect food processing premises: floors, walls and storage areas, hold container six to eight inches from the surface to be treated and spray area until it is covered with the solution. Allow (product or product name) to penetrate and remain wet for **10 minutes**. Wipe off with a clean cloth, mop or sponge and thoroughly rinse all surfaces in the area with potable water. Heavily soiled areas must be pre-cleaned before using this product. Food products and packaging materials must be removed or carefully protected prior to using this product.

Disinfection of animal quarters and kennels: For disinfection of pre-cleaned animal quarters and kennels, apply (this product or product name). Remove all animals and feed from premises. Remove all litter and droppings from floors, walls and surfaces of facilities occupied or traversed by animals. Empty all troughs, racks and other feeding and watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate the surfaces with the disinfecting solution for a period of **10 minutes**. Ventilate building and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed, set or dried. All treated equipment that will contact feed or drinking water must be rinsed with potable water before reuse.

To clean outdoor decks, patios, outdoor furniture and storage areas. Hold container 6 to 8 inches from the surface to be treated and spray area until covered with solution. Allow product to remain wet for 10 minutes, scrub surface wipe or rinse off. Heavily soiled areas may need precleaning prior to use of this product.

MASTER LABEL

EFFICACY TESTS HAVE DEMONSTRATED THAT (THIS PRODUCT or PRODUCT NAME) IS AN EFFECTIVE BACTERICIDE, VIRUCIDE, AND FUNGICIDE ON PRECLEANED SURFACES.

Using approved AOAC (under Good Laboratory Practices, [GLPs]), in the presence of 5% soil load serum and a 10 **minute** contact time, unless otherwise noted, (this product or product name) kills the following organisms on hard non-porous inanimate surfaces:

BACTERICIDAL ACTIVITY (BACTERIA):

- Pseudomonas aeruginosa*, (ATCC 15442)Π
- Staphylococcus aureus*, (ATCC 6538)
- Salmonella enterica* (ATCC 10708)
- Escherichia coli*, (ATCC 11229)

Using approved AOAC (under Good Laboratory Practices, [GLPs]), in a 10 **minute** contact time, unless otherwise noted, (this product or product name) kills the following organisms on precleaned hard non-porous inanimate surfaces:

BACTERICIDAL ACTIVITY (BACTERIA):

- Listeria monocytogenes* (ATCC 19115)

EFFICACY TESTS HAVE DEMONSTRATED THAT (THIS PRODUCT or PRODUCT NAME) IS AN EFFECTIVE BACTERICIDE AGAINST *Pseudomonas aeruginosa*, *Staphylococcus aureus*, *Salmonella enterica*, *Escherichia coli*, AND *Listeria monocytogenes*

FUNGICIDAL ACTIVITY – (This product or product name) is fungicidal against the pathogenic fungus, *Trichophyton mentagrophytes* (ATCC 9533) (Athlete’s Foot Fungus) (a cause of ringworm) (a cause of ringworm of the foot), when used with a **10 minute** contact time on precleaned, non-porous hard surfaces as found in bathrooms, shower stalls, locker rooms, or other areas commonly contacted with bare feet.

VIRUCIDAL ACTIVITY – (This product or product name) kills on hard, non-porous inanimate surfaces when allowed to remain wet for a 10-minute contact time against: **H1N1** virus deposited as **Influenza A**, (ATCC VR-1469)

This product or product name) when used on environmental, inanimate hard surfaces exhibits effective virucidal activity against, **Influenza A** and **H1N1** viruses, when the treated surface is allowed to remain wet for 10 minutes.

MILDEWSTAT – To control mold and mildew on pre-cleaned, hard, non-porous surfaces, spray surface to be treated making sure to wet completely. Let air dry. Repeat application at weekly intervals or when mildew growth appears.

Additional directions for use

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner **AUG 16 2010** inconsistent with its labeling.

<<Operation directions>>

To Operate: Turn nozzle [counter clockwise] to preferred usage.

To Refill: 1. Remove trigger sprayer (or cap) from empty bottle.
2. Unscrew cap on refill container and pour contents into empty bottle.
3. Replace trigger sprayer (or cap) and use this product as you normally would. (This product can also be used straight from this refill container)

To Refill: 1. Remove trigger unit from the empty bottle.
2. Attach the trigger unit to this product container.

To Refill (Bottle): Remove trigger sprayer from empty (bottle) (container). Unscrew cap on refill and pour contents into empty (bottle) (container). Replace trigger sprayer and use as you normally would. Refill container only with (this product).

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. **85837-1**

MASTER LABEL

- To Refill (Bottle):**
1. REMOVE: Remove trigger sprayer from empty (bottle) (container).
 2. POUR: Unscrew cap on refill and pour contents into empty (bottle) (container).
 3. USE: Replace trigger sprayer and use (product) as you normally would. (This product) can also be used straight from this refill container.

<<Cleaning directions>>

Safety First: Run the shower before entering to rinse shower/tub. Always stand on a non-slip surface when in shower or tub.

For Spot Cleaning: (Spray) (Apply) straight from the bottle and wipe clean with a damp (sponge) (cloth) (mop).

Floors: Cleans all washable no-wax, linoleum, vinyl and glazed ceramic tile floors. For easy cleaning, squeeze straight from the bottle and wipe clean with a damp mop.

General (Bathroom) (Restroom) (Washroom) (Household) (Kitchen) Cleaning: (Spray) (Apply to) soiled area, then wipe clean. No rinsing required.

General Cleaning: Turn nozzle counter clockwise to preferred usage. To clean household, kitchen and bathroom surfaces, spray dirty (soiled) area, then wipe clean. Repeat for stubborn stains. No rinsing required. To remove soap scum, spray bathroom surfaces then wipe clean. Allow product to penetrate soap scum before wiping.

TO CLEAN: (Spray) (Apply to) soiled area, then wipe clean. No rinsing required.

<<Disinfecting Directions>>

To Disinfect/Deodorize: Hold container 6"-8" from surface and spray until thoroughly wet. Let stand for 10 minutes then wipe clean. Rinse after use on surfaces that come in contact with food. For heavily soiled surfaces, pre-clean first. No rinsing required.

Fungicidal: Kills Trichophyton mentagrophytes (Athlete's Foot Fungus) when used as a disinfectant on (shower walls) (shower stalls), glazed ceramic tile floors, in/around shower areas and areas commonly contacted by bare feet.

Virucidal: Kills H1N1, Influenza A when allowed to remain in contact for 10 minutes

Kills Mold & Mildew: Pre-clean hard, non-porous surfaces. Apply product at full strength with (sponge) (cloth) (or) (trigger spray). Let surface remain wet for 10 minutes, allow to air dry. Repeat application at weekly intervals or when mold and mildew growth appears.

<<Deodorizing directions>>

<<Hard non-porous surface>>

To Deodorize: Spray (Apply to) surface until thoroughly wet. Let stand with second EPA Letter Dated:

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<<Advisory Statements>>

- Do not use on eating/cooking utensils, glasses/dishes or cookware.
- Do not use on outdoor patio furniture cushions and pillows.
- Do not use on unfinished, oil or waxed wood floors.
- Does not harm most (kitchen) (bathroom) surfaces.
- If the last portion (of this product) is difficult to dispense, turn trigger 180° to face opposite direction; this will ensure full use of its contents.
- On painted surfaces test a small inconspicuous area first.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 85837-1

MASTER LABEL

Rinse all food contact surfaces with potable water.
This product is not recommended for use on finished wood floors.
This product is not recommended for use on (natural) marble, brass or acrylic plastic.
This product is not recommended for use on (natural) marble, brass or acrylic plastic or finished wood surfaces.
This product is not recommended for use on finished wood floors, or for used on marble or brass.

Uses

<<Back Panel>>

<<Soil/Odor/Surface>>

Soils: (Graphic – depicting soil)

Bathtub rings	Fingerprint	Heel/Scuff mark	Pet stain
Beverage stain (Smudge)	Food stain	Mildew stain	Smear
Blood stain	Sweat/ perspiration	Urine	
Cosmetic stain	Grass stain	Mud	Soap scum
Crayon/Pencil Mark stain	Grease (Splatter)	Oil	Tough soil
Dirt	Grime	Outdoor grime	Wine/Juice
	Handprint	Pen/Ink mark	

ACCEPTED
with COMMENTS
EPA Letter Dated:

Odors: (Graphic – depicting odor)

Cooking
Pet
Smoke

AUG 16 2010
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 86837-1

Surface Types:

Chrome^	Fiberglass fixtures	Linoleum	Stainless steel
Finished wood floors			
Copper	Glass	Metal	Tin
Crystal	Glazed ceramic	Mirror	Vinyl
Enamel	Glazed porcelain	Plastic laminate	

^Non-medical or fixture

Hard Non-porous surfaces: (Graphic – depicting use site)

Appliance exterior	Garbage (Can) (Pail) (Container)	Range Hood/(Stove Hood)
Bathtub (Tub)	Glass topped furniture	Exterior
Bed frame	Glazed ceramic tile	Shelves (Drawers)
Cabinet	Glazed porcelain tile	Shower (Door) (Curtain)
Chair		
Dehumidifier parts	Humidifier parts	
Dehumidifier tanks	Humidifier tanks	
Grill (Bar-B-Que) exterior	Shower (Stall) (Area)	
Changing table	Highchair (non-food contact area)	Sink (Basin)
Computer screen	Light fixture	
Counter (Countertop)	Metal blinds	Table (Tabletop)
Crib	Microwave exterior	Telephone
Diaper pail	Non-medical (Chrome)	Television screen (TV screen)
Door knob (handle)	Non-medical (Stainless steel)	Tires
Exhaust (Fan) (Hood)	Outdoor patio furniture (non-wood)	Toilet bowl exterior/urinal
Fixture (Chrome)	Oven (Door)	Tools
Fixture (Stainless steel)	Painted woodwork	Vanity top

MASTER LABEL

Floor (Glazed ceramic tile)	Patio door	Washable (Wall) (Wallpaper)
Floor (Linoleum)	Piano keys	
Floor (Vinyl)	Picnic table (non-wood)	Window (Windowsill)
Finished Wood floors	Plastic Laundry (Basket) (Hamper)	Windshield
Kitchen surfaces (rinse direct food contact surfaces with a potable rinse after treatment)		
Stoves (rinse direct food contact surfaces with a potable rinse after treatment)		

Household Use Sites: (Graphic – depicting use site)

Basement	Family room	Kitchen	Outdoor area
Bathroom	Garage	Laundry room	Playroom
Bedroom	High-touch areas	Living room	Storage area/room
Den/study	Home/house	Mud room	Tool shed
Dining room	Household areas	Nursery	

Professional Use Sites: (Graphic – depicting use site)

ACCEPTED
with COMMENTS
EPA Letter Dated:

Cafeteria	Healthcare facility	Kitchen	Restaurant
Day Care center	Hospital	Nursing home	Restroom
Dental office	Hotel/motel	Office building	School (College)
Doctors office	Kennel	Physicians office	Veterinary office

AUG 16 2010

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

[Extended contact with this product may cause a temporary white appearance on the skin of some individuals. Bubbling or foaming may also occur upon contact with dry or damaged skin. These are normal effects from hydrogen peroxide and the white appearance should disappear quickly. To minimize these effects, rinse or wash hands promptly after contact.] [If extended contact with the product results in a temporary white appearance of the skin, or if foaming appears on dry or damaged skin, it is a common reaction to the hydrogen peroxide and will disappear quickly. To minimize the effect, rinse hands after using the product.]

FIRST AID

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

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.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

[**OPTIONAL:** You may contact xxx/xxx-xxxx for emergency medical treatment information.]

STORAGE AND DISPOSAL

(Note to reviewer: the following Storage and Disposal directions will be used for residential/household packaging:)

Store in areas inaccessible to children. Store in a cool dry place.

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15

MASTER LABEL

Container Disposal: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available.
Container Disposal for Refill Spray Bottle: Do not reuse empty spray bottle except with refill bottle, Offer for recycling, if available.

(Note to reviewer: the following Storage and Disposal directions will be used for industrial/commercial packaging:)

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Container Disposal of Refill Spray Bottle: Refill only with this product. Offer empty container for recycling. Triple rinse container according to the directions outlined above.

PRODUCT DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

AUG 16 2010

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Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85837-1