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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES
Antimicrobial Division

11/15/06

DP BARCODE:	D332532
MRID :	469279-01
SUBJECT:	TILEX
REG. NO. OR FILE SYMBOL:	5813-24
DOCUMENT TYPE:	Product Chemistry Review
Manufacturing-use [] OR	End-use Product [X]
INGREDIENTS (PC Codes)	Sodium hypochlorite (014703)
CAS Number:	(7681-52-9)
TEST LAB:	The Clorox Professional Products Company
SUBMITTER:	Clorox Company
GUIDELINE:	830.6317 & 830.6320
COMMODITIES:	Formulation
REVIEWER:	Juan F. Negrón ORGANIZATION: AD
APPROVER:	Karen P. Hicks APPROVED DATE: 11/15/06
COMMENT:	

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TO:	Mitchell Emily / Wanda Henson PM Team 32
FROM:	Juan F. Negrón, Chemist Product Science Branch, CT Team Antimicrobial Division (7510P)
THRU:	Karen P. Hicks, CT Team Leader Product Science Branch Antimicrobial Division (7510C)
THRU:	Michele E. Wingfield, Chief Product Science Branch Antimicrobial Division (7510C)

APPLICANT: The Clorox Company
Action code: 362
Due date: 12/05/06

Product Formulation
Active Ingredient(s)

	% by wt.
Sodium hypochlorite	2.40

BACKGROUND:

The registrant, The Clorox Company, is submitting a Storage Stability and Corrosion Characteristics studies for review. The non-integrated end-use product, TILEX, cleans, sanitizes, and disinfects nonporous surfaces.

FINDINGS:

1. The Product Chemistry Reviewer has received the following documents:
   - Transmittal document, dated 09/01/06, MRID #469279-00.
   - A label, dated 09/07/06.
   - Application for pesticide, dated 09/01/06, EPA Form 8570-1.
   - Study title "CLOROX Formula F2003.0148-Storage Stability Characteristics." MRID # 469279-01.

2. The study reveals that the study was conducted with one batch of "Tilex Mildew Root Penetrator and Remover" (Clorox formula F2003.0148).

3. No indication that the study was conducted using "TILEX ®."

4. The study indicates that the nominal is (See confidential appendix CBI).

5. The study was conducted during the zero day, and (3, 6, 9, 12) Months.

6. The results are based on the product, "Tilex Mildew Root Penetrator and Remover," and the assays are (See confidential appendix CBI). However, the registration is for the product named as "TILEX ®."

7. The storage stability assays fall within the certified limits indicated on the CSF. However, there is no indication that the product is "TILEX ®."

8. The study indicates that the Corrosion Characteristics study was not conducted. The registrant used an expression such as "Hence, no "blank samples" are required." The explanation is not acceptable and does not meet the "830.6320 Corrosion Characteristics" guideline.

RECOMMENDATIONS:

1. The registrant needs to clarify the storage stability study conducted on "Tilex Mildew Root Penetrator and Remover" instead of "TILEX ®" which is the registered product.

2. The registrant needs to submit the Corrosion Characteristics study to meet the guideline.

CONCLUSION:

The Storage Stability study (MRID # 469279-01) is acceptable once the registrant clarifies the findings and recommendation. The Corrosion Characteristics study is not acceptable.