



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

JUL 16 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Candice Rushton  
Regulatory Affairs Manager  
Betco Corporation  
1001 Brown Avenue  
Toledo, Ohio 43607

SUBJECT: **Pull**  
EPA Registration Number: 4170-52  
Application Date: June 7, 2010  
Receipt Date: June 10, 2010

Dear Ms. Rushton:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the conditions listed below:

**Proposed Amendment**

- Update Storage and Disposal statements per PR Notice 2007-4
- Update Precautionary Statements
- Update First Aid Statements
- Update to personal protection statement

**Conditions**

Revise the label as follows:

1. Change "Inert Ingredients" to "Other Ingredients".
2. Organize the FIRST AID statements in order of the most severe route of exposure. The correct order is as follows: "If on Skin or on Clothing", "If in Eyes", "If Swallowed", and "If Inhaled".
3. Update the Storage and Disposal statements per PR Notice 2007-4. The format and language for Storage and Disposal language is provided below:

## STORAGE AND DISPOSAL

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

**Pesticide Storage:** Store in original container, inaccessible to persons unfamiliar with its use.

**Pesticide Disposal:** Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

**Container Handling:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

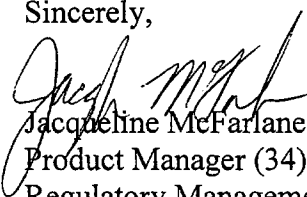
4. Under the Directions for Use, change the first subheading to read, "To Clean, Deodorize and Disinfect Toilet Bowls and Urinals".

### General Comments

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

Should you have any questions or comments concerning this letter, please contact please contact Heather Garvie at (703) 308-0034 or by email at [garvie.heather@epa.gov](mailto:garvie.heather@epa.gov).

Sincerely,



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

Enclosure: Stamped accepted label

**PRECAUTIONARY STATEMENTS**  
Hazards to Humans and Domestic Animals

**DANGER POISON**

**CORROSIVE:** Keep out of reach of children. Causes irreversible eye damage or skin burns. May be fatal if swallowed. Harmful if adsorbed through skin or inhaled. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist. Wear safety glasses, goggles, or face shield. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling. Wash hands thoroughly before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

**FIRST AID**

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless instructed to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. **IF ON SKIN OR ON CLOTHING:** Immediately take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. 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 mouth to mouth if possible. Call a poison control center or doctor for further treatment advice. **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, or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

**STORAGE AND DISPOSAL**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.

**MSDS No. 071**



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Toledo, Ohio 43607-0127  
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www.betco.com



**TOILET CLEANER**  
07112



**PULL®**

**Disinfectant Toilet Bowl • Urinal Cleaner**

Cleans, Disinfects, Deodorizes, Descals - with Organic Soil Tolerance

Kills HIV-1 on precleaned environmental surfaces/objects previously soiled with blood/body fluids.

**ACTIVE INGREDIENTS:**

Octyl decyl dimethyl  
ammonium chloride.....0.015%  
Dioctyl dimethyl  
ammonium chloride.....0.006%  
Didecyl dimethyl  
ammonium chloride.....0.009%  
Alkyl (50% C<sub>14</sub>, 40% C<sub>12</sub>, 10% C<sub>16</sub>)  
dimethyl benzyl  
ammonium chloride .....0.020%  
Hydrogen Chloride .....23.000%  
INERT INGREDIENTS: .....76.950%  
TOTAL .....100.000%

**NET CONTENTS: 1 quart**

**KEEP OUT OF REACH  
OF CHILDREN  
DANGER POISON**  
See side panel for additional  
precautionary statements and  
First Aid.  
**FOR INSTITUTIONAL AND  
COMMERCIAL USE.**

**EPA EST. NO. 4170-OH-1  
EPA REG. NO. 4170-52**

**DESCRIPTION:** This disinfectant (toilet bowl) and urinal cleaner is designed for Hospital, General Industrial, and Institutional use (schools, factories, nursing homes). Its broad spectrum activity cleans, descals, deodorizes, and disinfects in one easy step.

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

**TO CLEAN AND DISINFECT TOILET BOWLS AND URINALS:** Remove water from bowl by forcing it over the trap with a swab mop. Saturate swab mop with cleaner/disinfectant and wet all surfaces thoroughly. It is most important to swab under rim of bowl or urinal to clean and disinfect water outlets. Allow cleaner/disinfectant to remain for at least 10 minutes until all rust, scale, and stains are loosened. Rinse by flushing. For heavily soiled areas a preliminary cleaning is required.

This product has shown broad spectrum activity against microorganisms commonly found in toilet bowls and urinals, and has been evaluated in the presence of 5% serum and found to be effective against the following organisms by the AOAC Use-Dilution test: *PSEUDOMONAS AERUGINOSA*, *SALMONELLA ENTERICA*, *STAPHYLOCOCCUS AUREUS*. Kills HIV-1 on precleaned environmental surfaces/objects previously soiled with blood/body fluids in health care settings (Hospitals, Nursing Homes) or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS). **SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS. PERSONAL PROTECTION:** When handling items soiled with blood or body fluids use disposable protective gloves, gowns, masks, and eye coverings. **CLEANING PROCEDURES:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this product. **CONTACT TIME:** Allow surface to remain wet for 10 minutes. **DISPOSAL OF INFECTIOUS MATERIALS:** Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal.

10712

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

**JUL 16 2010**

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **4170-52**

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