

4170-68

7/27/2000

Page 1 of 6

Betco Corporation  
1001 Brown Avenue  
Toledo, Ohio 43607

JUL 27 2000

Subject: Sure Bet  
EPA Registration No. 4170-68  
Notification Per PR Notice 98-10

Attn: Candice Rushton  
Regulatory Affairs Specialist

This will acknowledge receipt of your notification to remove Fungistatic Activity Claims from the label, specifically Trichophyton mentagrophytes and making changes to the Precautionary statements, submitted under the provisions of FIFRA section 3 © 9. Based on a review of the submitted material, the following comments apply.

The application is acceptable and the notification has been made a part of the records for this file.

If you have any questions concerning the comments in this letter, you should contact Zenobia Jones at (703) 308-6198.

Sincerely,



Velma Noble  
Product Manager 31  
Regulatory Management Branch 1  
Antimicrobial Division (7510W)

CONCURRENCES

SYMBOL	7510W						
SURNAME	Z. Jones						
DATE	7-14-00						



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number  
225117

Application for Pesticide - Section I

1. Company/Product Number 4170-68	2. EPA Product Manager Velma Noble	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Sure Bet	PM# 31	
5. Name and Address of Applicant (Include ZIP Code) Betco Corporation 1001 Brown Avenue Toledo, Ohio 43607 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 4170-68 Product Name Sure Bet

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Removing Fungistatic Activity Claims from label, specifically Trichophyton mentagrophytes . Fungistats with this organism tested under same method as fungicides resulting in failure in North Carolina.

Additional changes made per ER Notice 2000-3.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
		If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 quart, 1 gallon, 5 gallon, 55 gallon		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input checked="" type="checkbox"/> Other <u>Silk Screen</u>	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Cardice Rushton	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) (419) 321-1951 ext. 3833
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  (Stamped)
2. Signature 	3. Title Regulatory Affairs Specialist	
4. Typed Name Cardice Rushton	5. Date 6/20/00	



Chemicals  
Equipment  
Programs  
Process

June 20, 2000

Velma Noble  
Product Manager (31)  
Front End Processing (AMEND)  
Office Of Pesticide Programs (7405C)  
United States Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

RE: AMENDMENT  
OPP Identifier #225117  
Sure Bet  
EPA Reg. No. 4170-68

This amendment is consistent with the provisions of PR Notice 95-2 and EPA regulations of 40 CFR 152.46, and no other changes have been made to this labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this amendment is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Betco Corporation is removing the claim for *fungistatic* activity, more specifically fungistatic activity as it pertains to *Trichophyton mentagrophytes* from the label for Sure Bet EPA reg. 4170-68, as it failed to kill *Trichophyton mentagrophytes* ATCC 9533 per the AOAC Fungicidal test conducted in the state of North Carolina. Information concerning this failure has already been submitted to EPA as required under FIFRA 6(a)2.

On the front Panel:

Betco has removed the word *fungistat*

On the back panel:

Betco has removed the words *Fungistatic Activity* and the statement *Fungistatic activity was confirmed by the method for evaluation of mildewstats on hard surfaces against: Aspergillus niger ATCC 6275 and Trichophyton mentagrophytes ATCC 9533.*

Additionally Betco Corporation is making the following changes to precautionary statements for consistency with PR Notice 2000-3:



Betco Corporation  
1001 Brown Avenue  
P.O. Box 3127  
Toledo, Ohio  
43607-0127  
419-321-1951  
Fax, 419-321-1955  
www.betco.com

Back Panel:

"Statement of Practical Treatment" has been changed to read "FIRST AID"

New First Aid Directions are as follows:

*If SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to do so. Do not give anything by mouth to an unconscious person. Do not induce vomiting unless prompted to do so by a poison control center or doctor.*

*IF IN EYES: Hold eye open and rinse slowly and gently for 15 –20 minutes. Remove contact lenses, if present after the first five minutes, then continue rinsing eye. Call a poison control center or doctor immediately for treatment advice.*

*IF ON SKIN OR ON CLOTHING: Take off contaminated clothing. Rinse immediately with plenty of water for 15 –20 minutes. Call a poison control center or doctor immediately for treatment advice.*

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

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

5 copies of the proposed labeling and application for pesticide are enclosed.

If you have any questions, or require further information, please feel free to contact me (419) 321-1951 ext. 3833.

Sincerely,



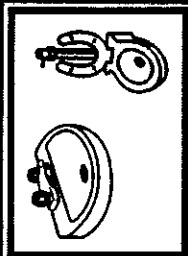
Candice Rushton  
Regulatory Affairs Specialist

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# RESTROOM CLEANER 31405



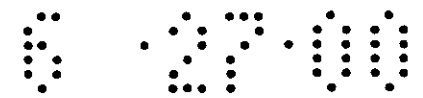
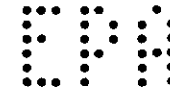
## SURE BET™

Foaming Shower • Restroom • Restroom • Restroom • Restroom

ACTIVE INGREDIENTS  
Caution: This product contains  
strongly alkaline ingredients  
which may irritate the skin  
and eyes. Avoid contact with  
skin and eyes. Wash thoroughly  
with water after use.  
KEEP OUT OF REACH OF CHILDREN  
DANGER  
See back and inside of container  
for first aid instructions.  
FOR INDUSTRIAL CHALK AND  
COMMERCIAL USE.

NET CONTENTS: 5 gallons

EPA EST. NO. 4170-DH-1 EPA REG. NO. 4170-63



**USE:**



**DESCRIPTION:** This formulation is a "one step" disinfectant-cleaner-mildewstat-deodorant which is effective in water up to 400 ppm hardness in the presence of 5% serum contamination at a 1:20 dilution (6.4 ounces/gallon). This formulation will remove hard water deposits and lime soap build-ups when used as directed. For hospital, institutional, and industrial use.

**DIRECTIONS FOR USE:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Remove gross filth or heavy soil. Apply use-dilution to glazed porcelain and glazed ceramic tiles, bathtubs, shower stalls, sinks, urinals, toilet bowl surfaces, related fixtures and other hard (inanimate), nonporous, environmental surfaces with a cloth, mop, or coarse spray device so as to thoroughly wet all surfaces. Allow to remain wet for at least ten minutes. Prepare fresh solution daily or more often when the solution becomes diluted or soiled. Heavy Duty Cleaning-For heavily soiled areas, a preliminary cleaning is required. Use product undiluted, and apply to soiled surfaces. Surfaces must remain wet for ten minutes. \*\*Hard Water Disinfection-At a 1:20 dilution (6.4 ounces/gallon) when evaluated by the AOAC Use-Dilution Test, this formulation is effective in the presence of 5% blood serum and 400 ppm hard water and found to be effective against a broad spectrum of gram-negative and gram-positive organisms as represented by: Pseudomonas aeruginosa, Staphylococcus aureus, Salmonella choleraesuis, Escherichia coli, Streptococcus pyogenes, Klebsiella pneumoniae, Enterobacter aerogenes, Proteus mirabilis, Shigella dysenteriae, Brevibacterium ammoniagenes, Salmonella typhi, and Serratia marcescens. (Mold and Mildew Control)-At 4.8 ounces/gallon use level, this formula will effectively control the growth of mold and mildew and odors caused by them when applied to hard, nonporous surfaces (as indicated in general instructions above). Allow to dry on surface and repeat when mildew growth returns. Kills HIV-1 on pre-cleaned environmental surfaces/objects previously soiled with blood/body fluids in health care settings 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 ON SURFACES/OBJECTS SOILED WITH BLOOD/BODY FLUIDS: PERSONAL PROTECTION: When handling items soiled with blood or body fluids use disposable latex gloves, gowns, masks, or eye coverings. CLEANING PROCEDURE: 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 MATERIAL: Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal. \*Virucidal Performance-At a 1:20 dilution (6.4 ounces/gallon) use level, this formulation was evaluated in the presence of 5% blood serum and 400 ppm hard water and found to be effective against Herpes Simplex Type 2 on hard, nonporous, inanimate, environmental surfaces.

63140

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

**CORROSIVE.** Keep out of reach of children. May be fatal or harmful if swallowed. Produces chemical burns. Do not get in eyes, on skin, or on clothing. Causes irreversible eye and skin damage. Wear goggles or safety glasses and rubber gloves when handling. Wash thoroughly with soap and water after handling. Avoid breathing fumes and vapors.

**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 do so. Do not give anything by mouth to an unconscious person. Do not induce vomiting unless prompted to do so by poison control center or doctor.  
**IF IN EYES:** Hold eye open and rinse slowly and gently 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 immediately for treatment advice.  
**IF ON SKIN OR ON CLOTHING:** Take off contaminated clothing. Rinse immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor immediately for treatment advice.  
**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label with you when you call a poison control center or doctor or when going for treatment.

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

**STORAGE AND DISPOSAL**

Store in original container only. Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL**

Pesticide wastes are acutely 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 DISPOSAL**

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

MSDS No. 314



Manufactured By:  
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