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DRP  
12/9/82

OCT 25 1982

Mr. Nick Sanchez  
Prentiss Drug & Chemical Co., Inc.  
303 7th Avenue  
New York, NY 10001

Dear Mr. Sanchez:

Subject: Amendments - Generalize Food Processing  
Areas & Delete Atropine Tablet Recommendation  
Prentox DDVP Five  
EPA Registration No. 655-536  
Your Applications Dated July 12  
and September 9, 1982

The amendments referred to above, submitted in connection with registration under FIFRA are acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a. Revise the front panel user group restriction to read "Only for Sale To, Use and Storage by Pest Control Operators."
  - b. Revise the subheading "Hazardous to Humans" to "Hazardous to Humans & Domestic Animals" and change "Poisonous if swallowed" to "May be fatal if swallowed."
  - c. Revise "Wear mask or respirator of a type passed by the U.S. Bureau of Mines for protection against this material to" or "wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part 11 for protection against DDVP."
  - d. Relocate "Not for use or storage in or around the home" up to directly beneath the misuse statement (It is a violation of Federal law...).
  - e. Delete the front panel heading and text "Antidote & First Aid Treatment" since it also recommends atropine tablet administration.

- i. A Statement of Practical Treatment must be added to the labeling. We suggest the following statement, however, if your toxicological data suggests otherwise, please submit a draft Statement of Practical Treatment for prior approval.

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. If possible, vomiting should be induced under medical supervision. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately.

- g. Delete the heading Antidote & First Aid Treatment: (Cont'd) and the associated two paragraphs with the subheadings "Internal" and "External" since these will be replaced by the Statements of Practical Treatment.
- h. Revise the heading "General Operating Instructions" to "General ULV Machine Operating Instructions," add after the closing parenthesis "Be sure operator is wearing required protective clothing," and then relocate this entire section to the left panel directly under "Repeat treatment at weekly intervals during season of peak insect activity for optimum results."
- i. The Space Spray and Contact Spray and For Use as a Contact Spray sections can then be relocated up to the top of the right panel under "Directions for Use (continued)."
- j. Add as the first item after the subheading Space Spray & Contact Sprays: "Do not use as a coarse contact spray in edible product areas of food processing plants, restaurants or other areas where food is commercially prepared or processed. Do not use in serving area while food is exposed."
- k. Revise the heading "Use and Application Directions" to "For Use as a ULV Space Spray."
- l. Revise the beginning of the posting precaution to read "Place Warning Signs at all entrances and exits stating "WARNING. Insecticide treatment in progress. This building should be opened ...."

- m. The text of the "STORAGE AND DISPOSAL" statements has been revised in compliance with the Resource Conservation and Recovery Act. Please revise your "STORAGE AND DISPOSAL" section in accordance with the enclosure.
- n. In the Precautionary Statements section all the subheading and text:

~~Environmental Hazards~~

~~Do not apply directly to any body of water.  
Do not contaminate water by cleaning of equipment  
or disposal of wastes. Apply this product  
only as specified on this label.~~

2. Submit five (5) copies of your final printed labeling before you release the product for shipment.

A stamped copy is enclosed for your records.

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767)

Enclosure