

66784-1

5/15/2012

1 of 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Fernando Figueredo
President & CEO
United Promotions, Inc.
3400 Peachtree Road, NE, Suite 1345
Atlanta, Georgia 30326

MAY 15 2012

SUBJECT: PronTech
EPA Registration Number: 66784-1

Dear Mr. Figueredo:

On June 25, 2010 your agent submitted a label for this product with a change of signal word from **Danger** to **Caution** along with a change of Precautionary Language. This label was stamped by the Agency on 7/28/10 in error. On April 3, 2012 we brought this matter to your attention. We indicated that you needed to submit revised labeling with the correct signal word and revised Precautionary Language.

Your product appears to be identical to 507-3 (transferred to your company on Sept 1, 2011 as 66784-2) based on the fact that both products have the same ingredients statement (listing active and inert ingredients) on the respective labels. You have not provided data to support a change of signal word from Danger to Caution. As a result the signal word needs to be corrected from Caution to Danger. If you want to keep the signal word Caution you must submit product specific toxicity studies to support this change.

If you do not intend to submit supporting toxicity data, then submit revised labeling correcting the signal word to **Danger** and correcting the Precautionary Statements to be in agreement with the stamped label dated 4/2/09 within 30 days from the date of this letter. This product is considered misbranded bearing the signal word Caution when the correct signal word is Danger with appropriate precautionary language.

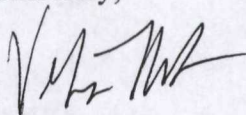
CONCURRENCES

SYMBOL	7510P						
SURNAME	J. Jantz						
DATE	5/14/12						

A copy of this letter will be sent to our Office of Enforcement and Compliance (OECA) to take appropriate action if we do not receive the revised labeling within 30 days.

Submit revised labeling which includes all of the changes indicated above. Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415.

Sincerely,



Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)

7510P:T.Lantz:4/3/12:66784-1 follow up incorrect signal word

CONCURRENCES

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