

ADAMS TECHNOLOGY SYSTEMS

5145 FOREST RUN TRACE - SUITE B • ALPHARETTA GA 30022-4504

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ATSSC STANDARD OPERATING PROCEDURE

SOP for:	EPA FIRST AID FORMAT	REV# 04	SOP# 49
SOP Written/Revised by:	Rob R. Adams, Jr	Rev. Date:	04/15/2004

I. PURPOSE

Adams Technology State Pesticide Registration Service Center (ATSSC) has been asked to review labels for the correct formatting of the First Aid Statement as per EPA PR Notice 2001-1. This SOP sets the ATSSC review strategy and shows an actual sample of the proper format required.

II. RESPONSIBILITY

Primary: Senior Registration Specialists
Secondary: ATSSC Service Center Manager

III. PROCEDURE

1. First Aid statements generally provide first steps to be taken by pesticide users, physicians and emergency responders of the appropriate medical procedures for victims of accidental pesticide exposure.
2. ATSSC reviewers need to understand that the purpose of this change is to make it easier for the consumer to find the critical information that may save a life or a potentially crippling injury. Reviewers must not only understand the purpose of this improvement but also the spirit of what the EPA and Pesticide Industry is trying to accomplish.
3. The EPA and States are not interested in the graphics, company trade dress or label claims. The most important thing is to get all of the precautionary, safety and directions formatted properly and on the label. All other things are secondary.
4. If space on the label is a legitimate concern, bring these problems to your supervisor's attention for ideas on how to make everything fit properly. To make EPA and State approval easier, ATSSC will highly recommend the boxed format as per the PR Notice.
5. Other formats that highlight the information and present it in a clear, easy-to-use fashion are acceptable. For example, increased white space, larger fonts, different colors and graphics may all help to make the First Aid information easier to find and follow.
6. The "Statement of Practical Treatment" heading has been changed to "FIRST AID." Very few people outside of the pesticide industry understood what a "Statement of Practical Treatment" was. Everyone understands "FIRST AID!"
7. First Aid statement sections are required when a product has been classified as Toxicity Category I, II or III, but are optional for products classified as Toxicity Category IV. ATSSC will recommend that statements be included for Toxicity Category IV. First Aid statements are to be organized so that the most severe routes of exposure are listed first. If unknown, use the order in the ATSSC sample: Eyes, Swallowed, Skin, Inhaled
8. The First Aid statements for all products classified as Toxicity Category I for oral, dermal or inhalation toxicity (systemic effects only) must appear on the front panel of the label.
9. The exact language in the PR Notice (and following sample) is to be used unless the registrant has an over-riding medical reason or the EPA has required different language.
10. Following is a sample of a setup that is in compliance with EPA PR Notice 2001-1.

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SOP-49 EPA FIRST AID Format Sample ATSSC Generic First Aid Box Condensed Format

This sample deletes the redundant language and condenses the box down to a size that should fit on most labels. This sample has been approved by the EPA. The language in [brackets] and *italics* are alternates, required under certain circumstances or are informational in nature.

The "Note To Physician" is only required on some labels. Examples and reasons are shown below. The currently approved EPA Stamped Label may also contain language that is required.

FIRST AID	
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. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.	
<i>[Toll free phone number language may be modified to fit company's policy. Suggestions follow:]</i>	
<i>[National Pesticide Information Center (NPIC) - 1-800-858-7378]</i>	
<i>[American Association of Poison Control Centers - 1-800-222-1222]</i>	
<i>[Animal Poison Control Center (APCC) - 1-888-426-4435]</i>	
If in eyes	<ul style="list-style-type: none">•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.
If swallowed	<ul style="list-style-type: none">•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 told to do so by the poison control center or doctor.•Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">•Take off contaminated clothing.•Rinse skin immediately with plenty of water for 15-20 minutes.
If inhaled	<ul style="list-style-type: none">•Move person to fresh air.•If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
NOTE TO PHYSICIAN	
<i>["NOTE TO PHYSICIAN" is required in the following instances]</i>	
Probable mucosal damage may contraindicate the use of gastric lavage. <i>[Only required if Toxicity Category I eye and skin irritants]</i>	
Contains petroleum distillate - vomiting may cause aspiration pneumonia. <i>[Only required if product contains ≥ 10% petroleum distillate]</i>	
<i>[Notes may also address the following information; as appropriate:</i>	
<i>- technical information on symptoms;</i>	
<i>- use of supportive treatments to maintain life functions;</i>	
<i>- medicine that will counteract the specific physiological effects of the pesticide;</i>	
<i>- company telephone number to specific medical personnel who can provide specialized medical advice.]</i>	

Updates:

[04/15/04: Added alternate poison control phone and information.]

[07/26/2003: Add "Call a poison control..." statement to "If swallowed:" as per request from EPA Label Unit.]