

SEP 29 1998

Randolph M. Reynolds
PARA Industries
P.O. Box 708
Wayne, New Jersey 07474-0708

Subject: CLICK Pure Para Moth Crystals
EPA Reg. No. 649-3
Your revised label of July 30, 1998

Dear Mr. Reynolds:

We have received the above revised labeling submitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The results of our review of these documents follow.

The labeling referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before you ship product:

1. Below the "Keep out of Reach of Children" warning, replace "Caution" with "Warning".
2. Delete "whenever space is opened and" from the Retreatment section and also from the Prevents Mildew section.
3. Add the statement "Notice: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals." at the end of the Precautionary Statements section.
4. In the First Aid section, add "Note to Physician:" before "Probable mucosal damage..."

A stamped copy is provided for your records. If you have questions about this letter, please contact Amy Caicedo at (703) 308-9399.

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

f:\user\acaicedo\ 649-3 ;[Paradichlorobenzene] 308-9399:9/9/98

275

EPA Reg. #649-3
Front/Back Panels:

CLICK PURE PARA MOTH CRYSTALS

**Kills Clothes Moths, Moth Larvae, and Carpet Beetles
Prevents Mildew and Deodorizes
in Air Tight Containers and Storage Closets**

ACCEPTED
with COMMENTS
in EPA Letter Dated:

ACTIVE INGREDIENT:

Paradichlorobenzene

99.9%

INERT INGREDIENT:

TOTAL:

SEP 29 1998
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

0.1%
100.00

649-3

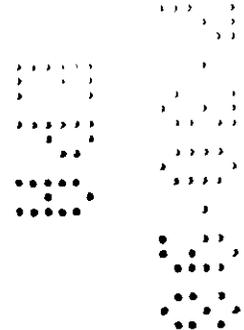
KEEP OUT OF REACH OF CHILDREN

~~CAUTION:~~

Warning

See Right Side Panel For Additional Precautionary Statements

NET WEIGHT 1 LB. (453.6 g)



Top Flap:

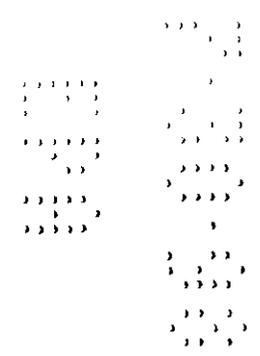
CLICK PURE PARA MOTH CRYSTALS

Kills Clothes Moths, Prevents Mildew, Deodorizes

**Protects clothing, blankets, woolens, furs from the ravages of
clothes moths**

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Left Side Panel:

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS AND CARPET BEETLES

USE RESTRICTIONS: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g., chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. As Paradi-chlorobenzene damages some plastics, do not use in plastic storage containers or place in contact with plastic items or painted/polished surfaces. For use only on cloth containing wool or wool blends.

PRE-APPLICATION DIRECTIONS: Before storing, dry clean, wash or brush articles to be protected.

APPLICATION DIRECTIONS: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

<u>Pounds of Product</u>	<u>Area of Tightly Enclosed Space</u>
1/4	Average Garment Bag
1/2	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e., 96 cubic feet) would need about 2 pounds of product (96/50=1.9).

POST APPLICATION DIRECTIONS: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

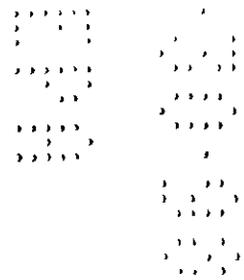
RETREATMENT: Since moths are active all year, replenish air-tight containers, bags, and closets whenever space is opened and at least 2 times a year.

RUGS: After cleaning, sprinkle over the entire surface of rug, 1 pound for an 8 x 10 foot rug. Roll, wrap in heavy paper, and seal.

TO PREVENT MILDEW DAMAGE: Use at least one ounce to each 3 cubic feet of tightly enclosed space, air-tight containers, or sealed closets. Replenish whenever space is opened and at least 2 times a year.

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think OK
1/3 = X 16 / 50

delete



Right Side Panel:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory tract irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. If symptoms persist, get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

to Physician;
Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

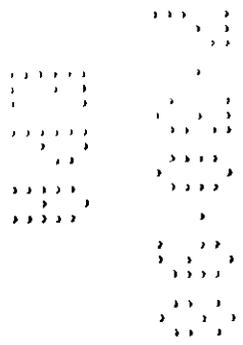
STORAGE: Store only in original container, in a cool, dry place inaccessible to children and pets.

DISPOSAL: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

COUGHLAN PRODUCTS CORP
Wayne, New Jersey 07474-0708

EPA Reg. No. 649-3
EPA Est. No. 2292-NJ1

MADE IN U.S.A.
Item 301



* Notice California