301 5-54/228

Willert Home Products 4044 Park Ave., St. Louis, MO 63110

Attention: Ms. Susan M. Hantak

APR 22 1998

Subject:

ENOZ Moth Ice Crystals

EPA Reg. No. 1475-1

Your amended application of April 3, 1998

In the above application you submitted a revised label and Confidential Statement of Formula (CSF). Our comments follow.

A. Confidential Statement of Formula (CSF)

Your revised CSF dated April 2, 1998, is acceptable. A copy has been placed in our files. All other versions are obsolete.

B. Revised Label

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

- 1. After "NO CLINGING ODOR" add "AFTER AIRING".
- 2. Revise your Ingredient Statement as follows:

ACTIVE INGREDIENT:

Paradichlorobenzene 99.84 %

INERT INGREDIENTS: 0.16 %

TOTAL 100.00°

3. Revise the statement: "WARNING: ... laboratory animals." to "NOTICE: California ... laboratory animals", as it appears in the format label.

4. Revise the "FIRST AID" statement as follows:

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting or given 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.

Probable mucosal damage may contraindicate the use of gastric lavage.

5. Under "Application Directions" change "2 feet wide" to "4 feet wide".

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Dan Peacock, Biologist

Insecticide-Rodenticide Branch

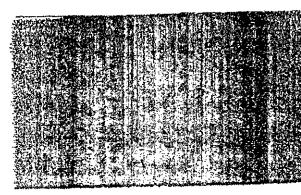
Registration Division (H7504C)

Enclosures:

1. Stamped Label

2. A-79 Enclosure

Peacock WP#16:A:\pdb\1475-1.apr:305-5407:4/22/98



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

KILLS CLOTHES MOTHS AND CARPET BEETLES

Use Restrictions: Kills 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 Paradichlorobenzene damages some plastics, use only in polyethylene or polypropylene containers.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected. Prevents moth infestation regardless of fabric type.

Application Directions: Apply product in clean, air-tight containers listed above at the rate of 1 pound for each 100 cubic feet of confined space. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 1 pound of product (96/50=149).

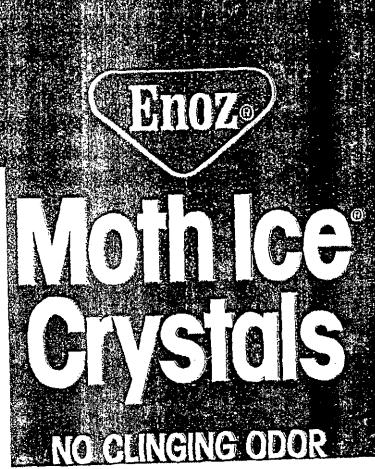
Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year or when product has dissipated.

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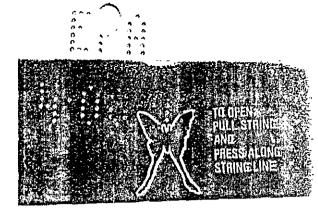


KILLS Clothes Moths, Eggs, Larvae in Air-Tight Containers and Storage Closets

ACTIVE INGREDIENT: Paradichlorobenzene 99.9% INERT INGREDIENTS: .1% 100.0%

KEEP OUT OF REACH OF CHILDREN. WARNING: SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

NET WEIGHT TILB ((454kg)



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 ir eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

WARNING: This product contains a chemical known to the State of California to cause cancer. This conclusion was based on scientific studies performed on laboratory animals.

FIRST AID: IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of water. Avoid alcohol. Probable mucosal damage may contraindicate the use of gastric lavage.

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.

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.

EPA Reg. No. 1475-1 EPA Est. 1475-MO-1



