Susan Hantak Executive Vice President Willert Home Products 4044 Park Avenue St. Louis, MO 63110

SEP 29 1998

Subject:

ENOZ Moth Cake

EPA Reg. No. 1475-7

Your letter of May 22, 1998

Dear Ms. Hantak:

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

- Since the product is less than 16 ourses, remove all references to closet because there is not enough product to treat an entire closet.
- 2. Change the statement "Prevents more infessiation regardless of fabric type" to "For use only on cloth containing wool or wool blends."
- In application directions complete the following changes: Item no. 125, replace "Remove celiphame from cake. Place cake in plastic holder..." to "Unwrap the cake, and while holding it by its cellophane wrapper, transfer it to the plastic hanger."

Item no. 125R, replace "Remove case from box. Take off cellophane wrap. Place cake in ENOZ plastic hanger..." to "Unwrap the cake, and while holding it by its cellophane wrapper, transfer it to the plastic hanger."

Item no. 1002, replace "Open container, remove cake. Take off cellophane wrap...replace cake in No-Moth container" to "Unwrap me cake, and while holding it by its cellophane wrapper, replace it in the No-Moth container.

Item no. 1021, replace "Open box, remove cake. Take off cellophane wrap...replace cake in No-Moth container" to "Unwrap the cakee, and while holding it by its cellophane wrapper, replace it in the No-Moth container."

Item no. 1642, replace "Take off celophane wrap...replace cakes" to "Unwrap cake one by one, and while holding each by its callophane wrapper, replace them in the container."

Item no. 1141, replace "Remove ceillophane wrap and replace cake in No-Moth HANGERETTE box" to "Unwrap the cake, and while holding it by its cellophane wrapper, replace it in the No-Moth HANGERETTE box."

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- 4. In the storage and disposal section, correct the statement "do not empty container..." to "do not reuse empty container..."
- 5. In the Notice section, performed is misspelled.
- 6. Revise the Ingredient Statement as follows:

ACTIVE INGREDIENT:

Paradichlorobenzene99.84% INERT INGREDIENTS: . . _ 0.16%

TOTAL 100.00%

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.

The Agency has determined that the Confidential Statement of Formula (CSF), dated 5/21/98, which was submitted under FIFRA, as amended, is acceptable. A copy of this CSF has been placed in our file for this product. All previous versions are obsolete. If you have any questions, please contact my assistant, Amy Caicedo on (703) 308-9399.

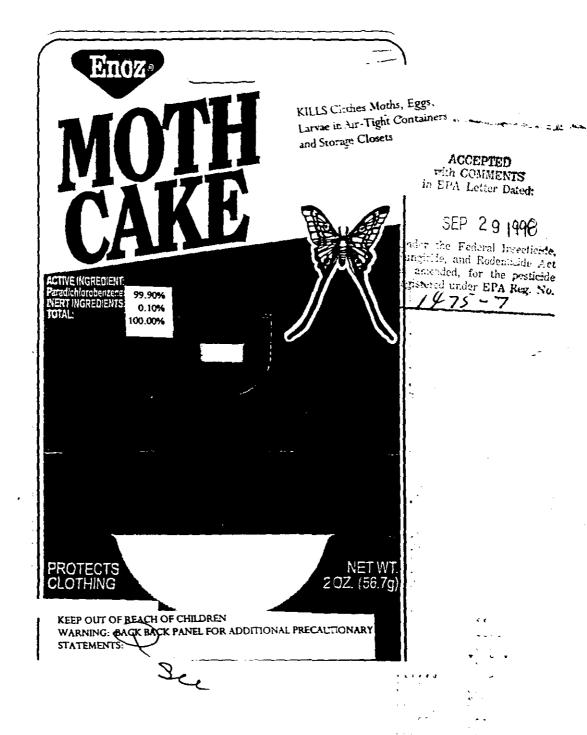
Sincerely yours,

Dan Peacock, Biologist Insecticide, Rodenticide Branch

Registration Division (7505C)

Enclosure

F:\user\acaicedo\1475-7 revise label .wpd;|Paradichlorobenzene| 308-9399:8/31/98



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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, airtight containers (e.g., chests and trunks) and garment bags. 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: Remove cellophane wrapper. Place cake in plastic hanger and hang in a garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake (2 oz.) for 7 cubic confined space. For a garment bag, multiply the width, depth and length and divide by 5400° to determine the number of ounces of product needed. For example, a garment bag 14.5° wide, 20° deep and 42° long (i.e. 12,180 cubic inches) would need 2.3 oz. of product.

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.

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 wash before reuse. NOTICE: This product contains a chemical known to the State of California to cause cancer. This conclusion was based on scientific studies preformed 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. 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. STORAGE AND DISPOSAL:

Storage: Store only in original container, in a cool, dry place inaccessible to children and pets. Disposal: Do not empty container (or packaging). Securely wrap in newspaper and discard in trash.

EPA Reg. No. 1475-7 EPA EST. 1475-MO-1







COMPOSITE LABEL

ENOZ MOTH CAKE EPA Reg. No. 1475-7 EPA Est. 1475-MO-1

FRONT PANEL:

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

ACCEPTED
with COMMENTS
in EPA Letter Dated:

KEEP OUT OF REACH OF CHILDREN

WARNING: BACK BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT

Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

475-2...

SEP 2g

Active Ingredient: PARADICHLOROBENZENE Inert Ingredient:

99.90% 0.10%

Total:

100.00%

NET WT. 2 OZ. (ENOZ Moth Cake)

NET WT. 4 OZ. (ENOZ Moth Cake Refills)

NET WT. 14 OZ. (REEFER-GALLER No-Moth Closet Hanger)

NET WT 1÷ OZ. (REEFER-GALLER No-Moth Refill)

NET WT 14 OZ. (REEFER-GALLER No-Moth Decorator Hang-Up Container)

NET WT 3 1/2 OZ (REEFER-GALLER No-Moth Hangerette

BACK PANEL -

DIRECTIONS FOR USE: (ENOZ Moth Cake) 2 oz. Item No. 125

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) and garment bags. 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: Remove cellophane wrapper. Place cake in plastic hanger and hang in a garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake (2 oz.) for 7 cubic feet of confined space. For a garment bag, multiply the width, depth and length and divide by 5400" to determine the number of ounces of product needed. For example, a garment bag 14.5" wide, 20" deep and 42" long (i.e. 12,180 cubic inches) would need 2.3 oz. of product.

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

Retreament: 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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<u>DIRECTIONS FOR USE</u>: (ENOZ Moth Cake Refills) 2 cakes Total 4 ozs. Item No. 125R 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) and garment bags. Do not use in containers, dry cleaning and garbage bags, or closers 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: Remove cake from box. Take off cellophane wrap. Place cake in ENOZ plastic hanger and hang in a garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake (2 oz.) for 7 cubic feet of confined space. For a garment bag, multiply the width, depth and length and divide by 5400" to determine the number of ounces of product needed. For example, a garment bag 14.5" wide, 20" deep and 42" long (i.e. 12,180 cubic inches) would need 2.3 oz. of product. Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when reated 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.

DIRECTIONS FOR USE: (REEFER-GALLER No-Moth Closet Hanger) 14 oz.

Item No. 1002

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling. KILLS CLOTHES MOFHS 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: Open container, remove cake. Take off cellophane wrap...replace cake in No-Moth container. Attach special hook to container where indicated by arrow. Hang No-Moth on clothes rod, or on clothes hook or place it on upper storage shelf. Apply product in clean, air-tight containers listed above at the rate of 1 container (14 oz.) for 43 cubic feet of confined space. For example, a storage unit 6.25 feet high, 3.5 feet wide and 2 feet deep (i.e. 43.75 cubic feet).

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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DIRECTIONS FOR USE: (REEFER-GALLER No-Moth Refill) 14 oz. Item No. 1021 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: Open box, remove cake. Take off cellophane wrap...replace cake in No-Moth container. Attach special hook to container where indicated by arrow. Hang No-Moth on clothes rod, or on clothes hook or place it on upper storage shelf. Apply product in clean, airtight containers listed above at the rate of 1 container (14 oz.) for 43 cubic feet of confined space. For example, a storage unit 6.25 feet high, 3.5 feet wide and 2 feet deep (i.e. 43.75 cubic feet). 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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DIRECTIONS FOR USE: (REEFER-GALLER No-Moth Decorator Hang-Up Container) 14 oz.

Item No. 1642

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: Open plastic container by pressing on side where indicated. Snap open cover. Fold out the hang-up hook. Remove the cakes from container. Take off cellophane wrap...replace cakes. Close lid. Snap shut. Hang on rod or hook high in closet, to insure the most effective vapor distribution. Convenient hook locks on rod by pushing tab into hole. Refill with NO-MOTH REFILL CAKES when needed. Apply product in clean, air-tight containers listed above at the rate of 1 container (14 oz.) for 43 cubic feet of confined space. For example, a storage unit 6.25 feet high, 3.5 feet wide and 2 feet deep (i.e. 43.75 cubic feet).

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.

DIRECTIONS FOR USE: (REEFER-GALLER No-Moth Hangerette) 14 oz. Item No. 1141

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: Open box. Remove cellophane wrap and replace cake in No-Moth HANGERETTE box. Punch holes out on sides and bottom of box. Apply product in clean, airtight containers listed above at the rate of 1 container (14 oz.) for 43 cubic feet of confined space. For example, a storage unit 6.25 feet high, 3.5 feet wide and 2 feet deep (i.e. 43.75 cubic feet). 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.

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 wash before reuse.

NOTICE: This product contains a chemical known to the State of California to cause cancer.

This conclusion was based on scientific studies preformed 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.

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.

STORAGE AND DISPOSAL:

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Storage: Store only in original container, in a cool, dry place inaccessible to children and pets. Disposal: Do not empty container (or packaging). Securely wrap in newspaper and discard in trash.

Wilkert Home Products
4044 Park St. Louis, MO 63110