# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

September 25, 2002

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

Attention: Ms Susan Hantak

Subject

Enoz® Moth Cake EPA Reg. No. 1475-7

Your amendment to correct the active ingredient percentage on the label and update your CSF dated May 31, 2002.

Label Approval The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- 1. Delete the non-pesticidal claim "Deodorizes" from your labeling. We are concerned that some consumers may use your product only as a deodorizer and not as a pesticide. Furthermore, the claim conflicts with some of the directions for use that instruct the user "Do not.....allow vapors to escape into occupied rooms." The Agency has concerns with inhalation exposure for your active ingredient and we believe that the "deodorizes" claim may conflict with this concern. We will apply this policy to all paradiclorobenzene products.
- 2. In the future, please submit a master label with the official product name ENOZ® Moth Cake prominently on the front panel. This is the only label we will stamp. You may continue to submit the sublabels as you have been doing in the past. As a general policy we do not stamp sublabels; we only stamp the master label. There should only be one stamped/approved label for each product. Stamped sublabels are confusing because it implies the (stamped) sublabel is the official label for the product. This situation is particularly relevant in enforcement situations.

Existing Stocks

Existing Stocks of previously approved labels may be used for 18 months.

EPA Contact If you have questions about this letter, please contact me at 703-605-0716 (by phone), 703-305-6596 (by fax), or mccann.geri@epa.gov (by E-Mail).

Sincerely yours,

Geraldine R. McCann

Insecticide/Rodenticide Branch

Registration Division

Mail Stop7505C

Enclosure

Stamped Label

## **MASTER LABEL**

This Master Label contains four (4) sublabels for the following products:

<b>ENOZ®</b>	Moth	Cake
--------------	------	------

Net Contents: 2 oz. Hang up Cake

### **ENOZ® Moth Cake Refills**

Net Contents: 2-2 oz. Refills Hang up

Cake

Reefer-Galler® No Moth Hangerette

Net Contents: 3.5 oz. Hang up Cake

Mothmaster® Moth Block

Net Contents: 5 oz. Hang up Cake

Active Ingredient:	Paradichlorobenzene	99.89%
Inert Ingredients:	•••••	00.11%
Total:	• • • • • • • • • • • • • • • • • • • •	100.00%

#### KEEP OUT OF REACH OF CHILDREN

## **WARNING**

See individual sublabels for additional precautionary statements and directions for use.

EPA Reg. No.	1475_7	ACCE		
		with COM	1MI	ENTS
EPA Est. No.	1475-MO-1	h EPA Let	ter	Dated
		SEP 2		

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

## **SUBLABEL** Enoz® Moth Cake 2 oz. Hang up Cake

#### FRONT LABEL:

#### ENOZ® Moth Cake

Kills Clothes Moths and Carpet Beetles and Their Eggs and Larvae, When Used In Air-Tight Containers This product can treat up to 6.25 cu. ft.

No Clinging Odor	Deodorizes	Protects Cloth	ing
ACTIVE INGREDIEN	T: Paradichlorobenz	ene	99.89%
<b>INERT INGREDIENT</b>	S		00.11%
TOTAL			100 00%

### KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements.

Net Contents: 2 oz. (56.7g)

#### **BACK LABEL:**

#### Directions for Use:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use Restrictions: This product can treat up to 6.25 cubic feet. Kills Clothes moths and Carpet beetles and their eggs and larvae in clean, airtight containers, such as chests, trunks, and garment bags. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventive chemicals.

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 hanger. Unwrap the cake, and while holding cake by the cellophane wrapper, transfer back into the plastic hanger. Place the filled plastic hanger at the top of the storage container. The vapors work downward. Keep product in airtight space for a minimum of 7 days. When cake has dissipated replace with new unit. Odor quickly vanishes when articles are aired.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals. WARNING: Causes eye, skin and respiratory tract irritation. Harmful if swallowed. Avoid contact with eyes, skin and clothing.

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

	FIRST AID
If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person drink several glasses of water.</li> <li>Do not induce vomiting.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> </ul>
	Call a poison control center or doctor for treatment advice.  HOT LINE NUMBER

Have the container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Telecommunications Network (NPTN) at 1-800-858-7378 for emergency medical treatment information.

#### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL/CHEMICAL HAZARD: DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME.

#### STORAGE AND DISPOSAL:

Storage: Store in the original container in a dry place inaccessible to children and pets. Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

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

## SUBLABEL Enoz<sup>®</sup> Moth Cake 2 oz. (Refill 2-2oz cakes) Hang up Cake

#### FRONT LABEL:

#### **ENOZ**<sup>®</sup> Moth Cake Refills

Kills Clothes Moths and Carpet Beetles and Their Eggs and Larvae, When Used In Air-Tight Containers Contains 2 - 20z refills Each refill can treat up to 6.25 cu. ft.

No Clinging Odor Deodorizes Protects Clothing

ACTIVE INGREDIENT: Paradichlorobenzene 99.89%
INERT INGREDIENTS 00.11%
TOTAL 100.00%

## KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements.

Net Contents: 2 - 2 oz. Cakes (113.4g)

#### **BACK LABEL:**

#### Directions for Use:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use Restrictions: Each refill can treat up to 6.25 cubic feet. Kills Clothes moths and Carpet beetles and their eggs and larvae in clean, airtight containers, such as chests, trunks, and garment bags. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers.

Paradichlorobenzene should not be mixed or placed in contact with other moth preventive chemicals.

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. Unwrap the cake, and while holding cake by the cellophane wrapper, transfer into the plastic hanger. Place the filled plastic hanger at the top of the storage container. The vapors work downward. Keep product in airtight space for a minimum of 7 days. When cake has dissipated replace with new unit. Odor quickly vanishes when articles are aired.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals.

WARNING: Causes eye, skin and respiratory tract irritation. Harmful if swallowed. Avoid contact with eyes, skin and clothing.

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

	FIRST AID
If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person drink several glasses of water.</li> <li>Do not induce vomiting.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
	HOT LINE NUMBER
treatment. You m	r or label with you when calling a poison control center or doctor, or going for any also contact the National Pesticide Telecommunications Network (NPTN) at 1-800-regency medical treatment information.
	NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL/CHEMICAL HAZARD: DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME.

#### STORAGE AND DISPOSAL:

Storage: Store in the original container in a dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

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

SIDE PANEL LABELS (Right and Left Panels)
MOTH CAKE REFILLS For PLASTIC HANGER

#### **SUBLABEL**

## Reefer-Galler® No Moth Hangerette 3.5 oz. Hang up Cake

#### FRONT LABEL:

## Reefer-Galler® No-Moth Hangerette

Kills Clothes Moths and Carpet Beetles and Their Eggs and Larvae, When Used In Air-Tight Containers This product can treat up to 10.9 cu. ft.

No Clinging Odor Deodorizes Protects Clothing

ACTIVE INGREDIENT: Paradichlorobenzene. 99.89%
INERT INGREDIENTS 00.11%
TOTAL 100.00%

## KEEP OUT OF REACH OF CHILDREN

#### WARNING

See back panel for additional precautionary statements.

Net Contents: 3.5 oz. (99.23g)

#### BACK LABEL:

#### Directions for Use:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use Restrictions: This product can treat up to 10.9 cubic feet. Kills clothes moths and carpet beetles and their eggs and larvae in clean, airtight containers, such as chests, trunks, garment bags and other storage containers. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventive chemicals.

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. Unwrap the cake, punch holes out of sides and bottom of the box and while holding cake by the cellophane wrapper, transfer cake back into the box. Place the filled box at the top of the storage container. The vapors work downward. Keep product in airtight space for a minimum of 7 days. When cake has dissipated replace with new unit. Oddr quickly vanishes when articles are aired.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals. WARNING: Causes eye, skin and respiratory tract irritation. Harmful if swallowed. Avoid contact with eyes, skin and clothing.

a chemical known to the State of California to cause cancer

1101100. 11115	FIRST AID
If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person drink several glasses of water.</li> <li>Do not induce vomiting.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
	HOT LINE NUMBER
treatment. You m	r or label with you when calling a poison control center or doctor, or going for any also contact the National Pesticide Telecommunications Network (NPTN) at 1-800-regency medical treatment information.

#### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL/CHEMICAL HAZARD: DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME.

#### STORAGE AND DISPOSAL:

Storage: Store in the original container in a dry place inaccessible to children and pets.

Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

Never place unused product down any indoor or outdoor drain.

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

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

## **SUBLABEL** MOTHMASTER® Moth Block 5 oz. Hang up Cake

#### FRONT LABEL:

#### MOTHMASTER® Moth Block

Protects Clothing! Kills Clothes Moths and Carpet Beetles and Their Eggs and Larvae, When Used In Air-Tight Containers Hangs Easily In Clothing Storage Containers This product can treat up to 15.6 cu. ft.

No Clinging Odor Deodorizes Protects Clothing 

INERT INGREDIENTS ...... 00.11%

## KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements.

Net Contents: 5 oz. (141.75g)

#### **BACK LABEL:**

Directions for Use:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use Restrictions: This product can treat up to 15.6 cubic feet. Kills Clothes moth and Carpet beetles and their eggs and larvae in clean, airtight containers, such as chests, trunks, and garment bags. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers.

Paradichlorobenzene should not be mixed or placed in contact with other moth preventive chemicals.

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

Application Directions: Unwrap the cake, and while holding cake by the cellophane wrapper hang at the top of the storage container. The vapors work downward. Keep product in airtight space for a minimum of 7 days. When cake has dissipated replace with new unit. Odor quickly vanishes when articles are aired.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals. WARNING: Causes eye, skin and respiratory tract irritation. Harmful if swallowed. Avoid contact with eyes, skin and clothing.

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

	FIRST AID
If swallowed	<ul> <li>Call poison control center or doctor immediately for treatment advice.</li> <li>Have person drink several glasses of water.</li> <li>Do not induce vomiting.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If inhaled	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
	HOT LINE NUMBER

Have the container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Telecommunications Network (NPTN) at 1-800-858-7378 for emergency medical treatment information.

#### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

PHYSICAL/CHEMICAL HAZARD: DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME.

#### STORAGE AND DISPOSAL:

Storage: Store in the original container in a dry place inaccessible to children and pets. Disposal: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

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