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APR 21 1998

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

Attention: Ms. Susan M. Hantak

Subject: Paradichlorobenzene  
EPA Reg. No. 1475-21  
Your letter of March 19, 1998

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. Directly below your name, change "For Manufacturing Use Only" to "An Insecticide for Formulation into Registered End-Use Products for Moth Control".
2. Revise the statement: "WARNING: ... laboratory animals." to "NOTICE: California ... laboratory animals", as it appears in the format label.
3. Revise the first sentence under use directions as follows:

An Insecticide for Formulation into Registered End-Use Products for Moth Control.

Since the "deodorant" use is not regulated under FIFRA, it need not appear as a use.

4. In the 3<sup>rd</sup> Sentence of the use directions, change "regional" to "Headquarters".
5. Under your "Storage and Disposal" section, change the subheading "DISPOSAL" to "PESTICIDE DISPOSAL" and delete the first sentence, "Waste ... waste facility."
6. Include a company name and address on your label.
7. Your current format for this product is unclear and difficult to follow for the following reasons:
  - a. The format provided in our January 8, 1998, letter separate the text for manufacturing-use products into separate headings, subheadings, and text for

clarity. Your label tends to blur the distinction in these categories by placing headings and subheadings on a single line.


- b. Your sentences are at least three times longer than a standard sentence (40 versus 12 words.
- c. You have used a landscape, rather than a portrait, format for presenting text, which results in long spaces of blank spaces on the label.

To correct these problems, you need to change from a one to a two panel label and separate headings, subheadings, and text, as shown in the format label.

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\1475-21.apr:305-5407:4/21/98

# PARADICHLOROBENZENE

Technical Grade - For Manufacturing Use Only.

ACTIVE INGREDIENT: Paradichlorobenzene 99.9%

INERT INGREDIENTS: .1%

TOTAL: 100.0%

NET WT. \_\_\_\_\_ lbs.

## KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS: HAZARD TO HUMANS AND DOMESTIC ANIMALS. WARNING: Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes skin and respiratory tract irritation. Wear goggles or face shield. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing 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.

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.

## ENVIRONMENTAL HAZARDS:

Do not discharge effluent containing this product into lakes, streams ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment authority. For guidance contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This product is intended for use in the manufacture of moth control products for use with clothing in air-tight containers (chests and trunks), garment bags, and storage closets and for the manufacture of deodorant products for use in areas such as washrooms, lavatories, and garbage receptacles.

It is the responsibility of the manufacturer of such products to develop specific directions for use that are appropriate and in compliance with all applicable government regulations. If assistance is required, contact Home Products or the regional office of the EPA.

## STORAGE AND DISPOSAL:

Do not contaminate water, food or feed by storage or disposal.

### STORAGE:

Do not use or store near heat or open flame. Do not exceed temperatures of 100°.

Avoid breathing dust or vapors. Use with adequate ventilation. In case of spill: Sweep up spilled material and place in original container for use or disposal.

### DISPOSAL:

Waste disposal should be by burning in an approved incinerator or by burial in a permitted hazardous waste facility.

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or residue is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your Pesticide or Environmental Control Agency, of the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

### CONTAINER DISPOSAL:

Fiber Drum Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then disposal of liner in a sanitary landfill or by incineration, if allowed by State and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

Paper and Plastic Bag Disposal: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burning, stay out of smoke.

EPA REG. NO. 1475-21

EPA EST. NO. 1475-MO-1

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

APR 21 1998

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
1475-21