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FEB 2 5 1999

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

Subject: **ENOZ PARA Moth Balls** EPA Reg. No. 1475-39 Your December 4, 1998, and January 26, 1999, letters, replaced by two letters dated February 10, 1999

Dear Ms. Hantak:

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The revised 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 of final printed labeling to us before you ship product.

- 1. As stated in our September 30, 1998, letter, remove all references to closet because all sizes under this registration (10 oz., 5 oz., 4 oz., and 7 oz.) are less than 16 ounces and there is not enough product to treat an entire closet. Although you have deleted most references, two still remain.
- 2. On Item No. 504W (ENOZ PARA Moth Balls, 4 oz.), correct "5 oz." with "4 oz.", and "15 cubic feet" with "13 cubic feet" under Application Directions.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. 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.

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Sincerely,

DRR

Daniel B. Peacock, Biologist Insecticide-Rodenticide Branch Registration Division (7504C) ŧ

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Enclosures: 1. Stamped Label 2. A-79 Enclosure

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3075 Working Lopy

ENOZ PARA MOTH BALLS EPA Reg. No. 1475-39 EPA Est. 1475-MO-1

FRONT PANEL:

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

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KEEP OUT OF REACH OF CHILDREN WARNING: SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS; EPA Key, No. 475-39

99.84% Active Ingredient: PARADICHLOROBENZENE 0.16% Inert Ingredient: 100.00% Total:

(ENOZ PARA Moth Balls) NET WT. 10 OZ. (ENOZ PARA Moth Balls) NET WT. 5 OZ. (ENOZ PARA Moth Balls) % NET WT. 4 OZ. NET WT. 7 OZ. (Value-Pak Para Moth Balls) & (Mothmaster Para Moth Balls)

No 531 Tablets

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DIRECTIONS FOR USE: (ENOZ PARA Moth Balls) - 10 oz. Item 10 E-30

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 or garbage bags that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not allow product to contact painted, varnished or polished surfaces. If used in plastic containers, use only 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. Some articles containing vinyl's and polyurethane's may be damaged by exposure to this product. Examples, include raincoats, gloves and purses.

Application Directions: Apply product in clean, air-tight containers listed above at the rate of, 1 bag (10 oz.) for 30 cubic feet of confined space. For example, a storage unit 7 feet high, 3 feet. wide and 1.5 feet deep (i.e. 31.5 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 and bags 2 times a year or when product has dissipated.

ACCEPTER * miniCOMMENTS in EPA' Letter Dated:

FEB 2 5 1999

Under the Federal Insecticide. Fungicide, and Rodenticide Act as amended, for the pesticide

DIRECTIONS FOR USE: (ENOZ PARA MOTH BALLS) 5 oz. Item No. 505P It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Und 5

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KILLS CLOTHES MOTHS AND CARPET BEETLES

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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 that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not allow product to contact painted, varnished or polished surfaces. If used in plastic containers, use only 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. Some articles containing vinyl's and polyurethane's may be damaged by exposure to this product. Examples, include raincoats, gloves and purses.

Application Directions: Apply product in clean, air-tight containers listed above at the rate of 1, bag (5 oz.) for 15 cubic feet of confined space. For example, a storage unit 4 feet high, 3 feet wide and 1.3 feet deep (i.e. 15.6 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, and bags 2 times a year or when product has dissipated.

DIRECTIONS FOR USE : (ENOZ PARA MOTH BALLS) 4 oz. Item No. 504PW 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 that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not allow product to contact painted, varnished or polished surfaces. If used in plastic containers, use only 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. Some articles containing vinyl's and polyurethane's may be damaged by exposure to this product. Examples, include raincoats, gloves and purses.

Application Directions: Apply product in clean, air-tight containers listed above at the rate of 1 bag (5 oz.) for 15 cubic feet of confined space. For example, a storage unit 5 feet high, 2.5 foot wide and 1 foot deep (i.e. 12.5 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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<u>DIRECTIONS FOR USE</u>: (Value-Pak Para Moth Balls) & (Mothmaster Para Moth Balls) 7 oz. It is a violation of Federal law to use this product in a manner inconsistent with its labeling. KILLS CLOTHES MOTHS AND CARPET BEETLES Say

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 or garbage bags that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not allow product to contact painted, varnished or polished surfaces. If used in plastic containers, use only 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. Some articles containing vinyl's and polyurethane's may be damaged by exposure to this product. Examples, include raincoats, gloves and purses.

Application Directions: Apply product in clean, air-tight containers listed above at the rate of 1 bag (7 oz.) for 21 cubic feet of confined space. For example, a storage unit 3 feet high, 1.5 feet wide and 4.9 feet deep (i.e. 21.9 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 and bags 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 performed on laboratory animals.

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.

Note 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.

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