

1475-74

08/24/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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

AUG 24 2005

Dear Ms. Hantak:

Subject: Labeling Amendment; Addition of Bulk Sizes- 55, 100, 200, 300 lb.
ENOZ Old Fashioned Moth Balls
EPA Registration No. 1475-74
Submission Date: August 4, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Include the sentence, "If burned, stay out of smoke." at the end of the Container Disposal statement found within the STORAGE AND DISPOSAL section of the label.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

DK: 306-0415: IRB/PM01

CONCURRENCES

Table with 3 rows (SYMBOL, SURNAME, DATE) and 8 columns for concurrences.

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**MASTER LABEL**

**EPA Reg. No. 1475-74  
ENOZ® Old Fashioned Moth Balls**

**SUBLABEL – 10, 11, 12, 13, 14, 16 and 24 oz. sizes  
SUBLABEL - Bulk Size Products 55, 100, 200, 300 lb. Sizes**

ACTIVE INGREDIENT: Naphthalene.....	99.95%
INERT INGREDIENTS: .....	<u>00.05%</u>
TOTAL: .....	100.00%

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

**AUG 24 2005**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
1475-74

SUBLABEL - 10, 11, 12, 13 14, 16 and 24 oz. sizes  
FRONT PANEL:

### ENOZ® Old Fashioned Moth Balls

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

- This product can treat up to 31.3 cu. ft. (10 oz.)
- 34.4 cu. ft. (11 oz.)
- 37.5 cu. ft. (12 oz.)
- 40.6 cu. ft. (13 oz.)
- 43.7 cu. ft. (14 oz.)
- 50 cu. ft. (16 oz.)
- 75 cu. ft. (24 oz.)

ACTIVE INGREDIENT: Naphthalene.....	99.95%
INERT INGREDIENTS: .....	<u>00.05%</u>
TOTAL: .....	100.00%

KEEP OUT OF REACH OF CHILDREN

### WARNING

See back panel for additional precautionary statements.

- Net Contents: 10 oz. (283.50g)
- 11 oz. (311.85 g)
- 12 oz. (340.19 g)
- 13 oz. (368.54 g)
- 14 oz. (396.89 g)
- 1 lb. (453.60 g)
- 24 oz. (630.39 g)

### RIGHT SIDE PANEL:

Be Safe! Protect in Winter and Summer

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 their eggs and larvae in clean, airtight containers, such as chests, trunks, garment bags and storage closets. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. Naphthalene should not be mixed or placed in contact with other moth preventive chemicals. For use only on cloth containing wool or wool blends.

NOT FOR USE TO CONTROL SQUIRRELS, BATS AND BIRDS IN THE HOME.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected. Use Directions are continued on Left Side Panel.

**LEFT SIDE PANEL:**

Use Directions continued from Right Side Panel.

Application Directions: The mothballs in this container can treat up to [31.3 cubic feet for 10 oz. box; 34.4 cubic feet for 11 oz. box; 37.5 cubic feet for 12 oz. box; 40.6 cubic feet. for 13 oz. box; 43.7 cubic feet for 14 oz. box; 50 cubic feet for 16 oz. box; 75 cubic feet. for 24 oz. box]. One ounce or 10 mothballs can treat 3 cubic feet.

Apply product in clean, airtight containers, bags and closets at the following rates:

<u>Ounces of Product</u>	<u>Volume of Enclosed Space</u>
4	Average Garment Bag (12 cu. ft.)
5.5	Large Trunk (15 cu. ft.)
16	Small Closet (50 cu. ft.) <i>(only for 16 and 24 oz. containers)</i>

For (larger) closets and (larger) containers, calculate the volume to be treated by multiplying the height, width, and depth of the space. The proper treatment of larger volumes may require the use of additional containers of ENOZ® Old Fashioned Moth Balls. To insure protections of your cloths use the recommended amount of ENOZ® Old Fashioned Moth Balls.

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

Re-treatment: Moths are active all year. In order to maintain protection of your garments, replenish mothballs that have dissipated.

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**BACK PANEL:**

**PRECAUTIONARY STATEMENTS:** Hazards to Humans and Domestic Animals.

**WARNING.** May be fatal if inhaled. Do not breathe vapors. Avoid contact with skin, eyes or clothing. Remove contaminated clothing and wash clothing before reuse. Harmful if swallowed. Wash thoroughly with soap and water after handling.

<b>FIRST AID</b>	
If swallowed	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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>
<b>HOT LINE NUMBER</b>	
<p>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 Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.</p>	

**Physical or Chemical Hazards**

Combustible. 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. 1475-74  
EPA Est. No. 1475-WV-1

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

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SUBLABEL – Bulk Size Product (55, 100, 200 and 300 lbs. Sizes)

### ENOZ® Old Fashioned Moth Balls

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

This product can treat up to 2,750 cu. ft. (55 lb. size)  
5,000 cu. ft. (100 lb. size)  
10,000 cu. ft. (200 lb. size)  
15,000 cu. ft. (300 lb. size)

ACTIVE INGREDIENT: Naphthalene.....	99.95%
INERT INGREDIENTS: .....	00.05%
TOTAL: .....	100.00%

KEEP OUT OF REACH OF CHILDREN

### WARNING

See back panel for additional precautionary statements.

Net Contents: 55 lb. (24.95 kg)  
100 lb. (45.36 kg)  
200 lb. (90.72 kg)  
300 lb. (136.08 kg)

Be Safe! Protect in Winter and Summer

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 their eggs and larvae in clean, airtight containers, such as chests, trunks, garment bags and storage closets. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. Naphthalene should not be mixed or placed in contact with other moth preventive chemicals. For use only on cloth containing wool or wool blends.

NOT FOR USE TO CONTROL SQUIRRELS, BATS AND BIRDS IN THE HOME.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: The mothballs in this container can treat up to (2,750 cubic feet for (55 lb. size), (5,000 cubic feet for 100 lb. size), (10,000 cubic feet for 200 lb. size), (15,000 cubic feet for 300 lb. size). One ounce or 10 mothballs can treat 3 cubic feet.

Apply product in clean, airtight containers, bags and closets at the following rates:

<u>Ounces of Product</u>	<u>Volume of Enclosed Space</u>
4	Average Garment Bag (12 cu. ft.)
5.5	Large Trunk (15 cu. ft.)
16	Small Closet (50 cu. ft.)

For (larger) closets and (larger) containers, calculate the volume to be treated by multiplying the height, width, and depth of the space. The proper treatment of larger volumes may require the use of additional containers of ENOZ® Old Fashioned Moth Balls. To insure protections of your cloths use the recommended amount of ENOZ® Old Fashioned Moth Balls.

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

Re-treatment: Moths are active all year. In order to maintain protection of your garments, replenish mothballs that have dissipated.

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals.

WARNING. May be fatal if inhaled. Do not breathe vapors. Avoid contact with skin, eyes or clothing. Remove contaminated clothing and wash clothing before reuse. Harmful if swallowed. Wash thoroughly with soap and water after handling.

<b>FIRST AID</b>	
If swallowed	<ul style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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 style="list-style-type: none"> <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>
<b>HOT LINE NUMBER</b>	
<p>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 Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.</p>	

**Physical or Chemical Hazards**

Combustible. Do not use or store near heat or open flame.



**STORAGE AND DISPOSAL**

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

**Pesticide Storage:**

Store in a cool dry place. Do not store at elevated temperatures. This material melts at 176° F (80° C). Avoid breathing dust or vapors. Use and store with adequate ventilation. Sweep up spilled material and place in original container for use or disposal.

**Pesticide Disposal:**

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

**Container Disposal:**

**Paper and Plastic Bag Disposal (55 lb. size):** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration if allowed by State and local authorities.

**Fiber Drum Disposal (100, 200 and 300 lb. sizes):** Completely empty drum. Empty residue into application equipment. Then dispose of drum in a sanitary landfill or by incineration if allowed by State and local authorities.

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