

1475-74

7/9/2009

1/1



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 9, 2009

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

332
1300

Decision #s
416 210 & 416 214
Submission Bar Codes
5-853018 & 5-853022
Decision #s:

Attention: Ms. Kathie J. Tryson

Subject Enoz® Old Fashion Moth Balls
EPA Reg. No. 1475-74
Your Two Notifications of June 15, 2009

Purpose The Agency has received your two submissions for Application for Pesticide Notification under Pesticide Registration Notices (PRN) 1997-6, 1998-10, and 2007-4 to make several label changes for this product.

Review The Registration Division (RD) has conducted a review of these requests, which appear to differ only in the sizes of the retail container¹ for its applicability under the above PRNs and has found that the actions falls within the scope of this PR Notice.

Note The preferred order of text for the "DISPOSAL" section for containers with 24 oz or less of product is:

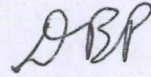
DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** ...

because the text "Non-refillable ... this container" refers to both "If empty" and "If partly filled" texts. See enclosure.

¹ 1st of 2 Notifications, Container Sizes: 14, 16 oz; 55, 100, 200, 300 lb and 2nd of 2 Notifications, Container Sizes: 7 through 14, 16, 24, oz; 55, 100, 200, 300 lb.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-308-0029 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



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

Enclosure Storage and Disposal Text for Containers of 24 oz or Less for EPA Reg. No. 1475-39 or 74.

File Dan Peacock, Flash Drive, 16gb, E:\4G
Location Dan\Doc\Word\Notifications\Letters\Letters DPeacock\1475-74. Not. 6-15-2009, ltr 7-8-2009.doc

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 11-30-93



United States Environmental Protection Agency
Office of Pesticide Programs (H7505C)
Washington, DC 20460

Application for Pesticide:

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Section I

1. Company/Product Number 1475-74	2. Product Manager J. Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ENOZ Old Fashioned Moth Balls	PM# 7	
5. Name and Address of Applicant (include ZIP Code) Willert Home Products 4044 Park Avenue St. Louis, MO 63110 <input type="checkbox"/> Check if this is a new address	6 Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labelling to: NOTIFICATION EPA Reg. No. <u> </u> Product Name <u> </u> JUL 09 2009	

Section II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed label in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "ME TOO" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below

Explanation: Use additional page(s) if necessary. (For section I and Section II)

Notification per PR Notices 98-10, 2007-4 and 97-6: Miscellaneous corrections per PR Notice 98-10 (see cover letter for details), "Nonrefillable container. Do not reuse or refill this container." and "Offer for recycling if available" per PR Notice 2007-4, and "Other ingredients" per PR Notice 97-6. Enclosed are copies of revised labeling with the changes highlighted. Certification on attached letter.

Section III

1. Material in Which This Product Will Be Packaged:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes * <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water-Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
* Certification must be submitted.		If "YES," Unit package wgt	No. per container	If "YES," Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container 7,8,9,10,11,12,13,14,16,24 oz. 55,100, 200, 300 lb.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed To Product <input checked="" type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section IV

1. Contact Point (Complete items directly below for identification of the individual to be contacted, if necessary, to process this application)			6 Date Application Received (Stamped)
Name Kathie J. Tryson	Title Director, Regulatory Affairs	Telephone No. (include Area Code) 314-659-1430	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 	3. Title Director, Regulatory Affairs		
4. Typed Name Kathie J. Tryson	5. Date June 15, 2009		

WILLERT HOME PRODUCTS

NOTIFICATION PER PR NOTICES 98-10, 2007-4 & 97-6

June 15, 2009

Mr. Daniel Peacock, Product Team 7
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202



Subject: Notification of Label Revisions per PR Notices 98-10, 2007-4, & 97-6
ENOZ® Old Fashioned Moth Balls
EPA Reg. No. 1475-74

*2nd of 2 Notifications
submitted 6/15/2009*

Dear Mr. Peacock:

Enclosed please find our Notification of label revisions per PR Notices 98-10, 2007-4, and 97-6. Per PR Notice 98-10, we are making miscellaneous corrections including "Net Contents" to "Net Weight" as appropriate for a solid product, removal of the phrase "Be safe" as the Agency does not allow use of the word "safe" on pesticide labels, and relocation of Storage and Disposal to the Directions for Use section where it should be. We are also taking this opportunity to add "Nonrefillable container. Do not reuse or refill this container." and "Offer for recycling if available." to the Disposal section per PR Notice 2007-4, and to change "Inert ingredients" to "Other ingredients" per PR Notice 97-6. The following documents are included:

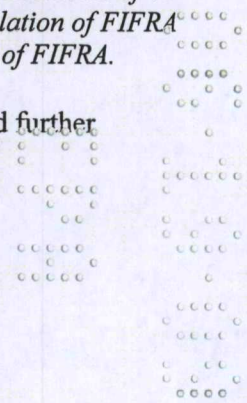
1. One application on EPA Form 8750-1
2. Two copies of revised labeling, one with the changes highlighted.
3. One copy of our most recent stamped accepted label for your reference.

This notification is consistent with the guidance in PR Notices 2007-4, 97-6 and 98-10 and the requirements of EPA's regulations at 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please call me at 314-649-1430 or email me at ktryson@willert.com if you need further information. Thank you very much for your attention to this Notification.

Sincerely,


Kathie J. Tryson
Director, Regulatory Affairs



MASTER LABEL

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

*2nd of 2
notifications
submitted
6-15-2009*

NOTIFICATION

JUL 09 2009

This Master Label contains two sub-labels:

1. SUB-LABEL - 7, 8, 9, 10, 11, 12, 13, 14, 16 and 24 oz. sizes

2. SUB-LABEL - Bulk Size Products - 55, 100, 200, 300 lb. sizes

1. SUB-LABEL – 7, 8, 9, 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. [Value Size! 24 oz.]

- This product can treat up to 21.9 cu. ft. (7 oz.)
- 24.8 cu. ft. (8 oz.)
- 28.1 cu. ft. (9 oz.)
- 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./1 lb.)
- 75 cu. ft. (24 oz./1 lb. 8 oz.)

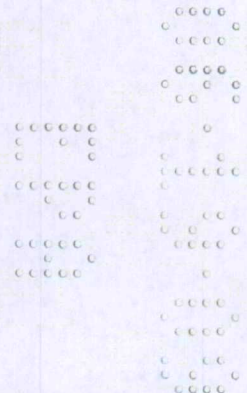
ACTIVE INGREDIENT: Naphthalene.....	99.95%
OTHER INGREDIENTS:	00.05%
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

- Net Weight: 7 oz./ 198 g
- 8 oz./ 226 g
- 9 oz./ 255 g
- 10 oz./ 283 g
- 11 oz./ 311 g
- 12 oz./ 340 g
- 13 oz./ 368 g
- 14 oz./ 396 g
- 1 lb./ 453 g
- 1 lb. 8 oz./680 g



7/11

[RIGHT SIDE PANEL:]

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 [21.9 cubic feet for 7 oz. box; 24.8 cubic feet for 8 oz. box; 28.1 cubic feet for 9 oz. box; 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	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 protection of your clothes 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.

[BACK PANEL:]

STORAGE AND DISPOSAL

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

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

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.

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person drink several glasses of water. • Do not induce vomiting. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
<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.

Not For Sale in the State of California.

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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9/11

2. SUB-LABEL – Bulk Size Product (55, 100, 200 and 300 lb. 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:	<u>00.05%</u>
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

See [back panel][below] for additional precautionary statements.

Net Weight: 55 lb. (24.9 kg)
100 lb. (45.3 kg)
200 lb. (90.7 kg)
300 lb. (136 kg)

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.

10/11

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	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 protection of your clothes 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.

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): **Non-refillable container. Do not reuse or refill this container. 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, or offer for recycling if available.**

Fiber Drum Disposal (100, 200 and 300 lb. sizes): **Non-refillable container. Do not reuse or refill this container. 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, or offer for recycling if available.**

11/11

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.

FIRST AID	
If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person drink several glasses of water. • Do not induce vomiting. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
<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.

Not For Sale in the State of California.

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

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