



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 13, 2021

Kelly Webster
Director, Regulatory Affairs
Willert Home Products, Inc.
4044 Park Avenue
St. Louis, MO 63110

Subject: Notification per PRN 98-10 – To add a new 2 lb. packaging size and other associated text
Product Name: ENOZ Old Fashioned Moth Balls
EPA Registration Number: 1475-74
Application Date: 3/1/2021
Decision Number: 572919

Dear Ms. Webster:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact please contact Jasmin Jackson at 703-347-0732 or by email at jackson.jasmin@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Jasmin Jackson for".

Gene Benbow, Product Manager 7
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

MASTER LABEL

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

This Master Label contains three sub-labels:

- 1. SUB-LABEL – 4, 6, 8, 10, 12, 14, 15, 16, 18, 20, 24, 32, 48 oz. wrapped moth balls**
- 2. SUB-LABEL - Bulk Size Products - 55, 100, 200, 300 lb.**
- 3. SUB-LABEL – 4, 6, 8 oz. pre-filled moth ball stations**

- 1. SUB-LABEL – 4, 6, 8, 10, 12, 14, 15, 16, 18, 20, 24, 32 and 48 oz. sizes**

Optional Marketing Claims for Use with Wrapped Product

- 1. Now wrapped for easy use!
- 2. Now wrapped for convenience!
- 3. Wrapped for your protection
- 4. No-touch
- 5. No handling
- 6. No [direct] contact with skin
- 7. Protective wrap – no direct contact with skin
- 8. Breathable film allows moth control to pass through and provides a barrier against contact with skin.
- 9. Protective breathable wrap provides barrier against direct skin contact
- 10. Protective wrap - effective barrier against skin contact
- 11. Pre-measured packets
- 12. Accurate pre-measured packets
- 13. Ideal size packets
- 14. Single use [breathable] packets
- 15. Packets are ideal size for consumer storage spaces
- 16. No waste!
- 17. No mess no guess!
- 18. Takes the guesswork out of using mothballs
- 19. Premeasured for optimum effectiveness
- 20. Premeasured for efficiency
- 21. Measured quantity delivers [exact] amount necessary to kill moths, their eggs and larvae
- 22. Convenient single use packets
- 23. Contains [x] packets [x=number of packets in container]
- 24. Contains [x] [y] oz. packets [x=number of packets in container, y = size of inner packet]
- 25. Packets [x] [y] oz. Convenient Single Use Packets! [x=number of packets in container, y = size of inner packet]

NOTIFICATION

1475-74

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

4/13/2021

FRONT PANEL:

ENOZ® Old Fashioned Moth Balls

Kills Clothes Moths, Eggs and Larvae in Air-Tight Containers and Storage Closets. [Value Size! 24 oz.][3 lb Super Size!] **[2lb Value Size!]**

- This product can treat up to 12.4 cu. ft. (4 oz.)
- 18.6 cu. ft. (6 oz.)
- 24.8 cu. ft. (8 oz.)
- 31.3 cu. ft. (10 oz.)
- 37.5 cu. ft. (12 oz.)
- 43.7 cu. ft. (14 oz.)
- 46.5 cu. ft. (15 oz.)
- 50 cu. ft. (16 oz./1 lb.)
- 55.8 cu. ft. (18 oz./1 lb. 2 oz.)
- 62.5 cu. ft. (20 oz./1 lb. 4 oz.)
- 75 cu. ft. (24 oz./1 lb. 8 oz.)
- 100 cu ft. (32 oz./2 lb)**
- 150 cu. ft. (48 oz./3 lb)

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

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

- Net Weight: 4 oz./113 g
- 6 oz./170 g
- 8 oz./226 g
- 10 oz./283 g
- 12 oz./340 g
- 14 oz./396 g
- 15 oz./425 g
- 1 lb./453 g
- 1 lb. 2 oz./510 g
- 1 lb. 4 oz./567 g
- 1 lb. 8 oz./680 g
- 2 lb / 907g**
- 3 lb /1.36 kg

[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.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

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. Do not mix naphthalene or use it together with other moth preventive chemicals. For use only on cloth containing wool or wool blends. To insure protection of clothing, follow the application directions carefully. Do not apply more product than specified for the area being treated. **IMPORTANT: It is illegal to sell the sachets [packets] individually. Do not open sachets[packets].**

NOT FOR USE TO CONTROL SQUIRRELS, BATS AND BIRDS INSIDE 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 [12.4 cubic feet for 4 oz. package; 18.6 cubic feet for 6 oz. package; 24.8 cubic feet for 8 oz. package; 31.3 cubic feet for 10 oz. package; 37.5 cubic feet for 12 oz. package; 43.7 cubic feet for 14 oz. package; 46.5 cubic feet for 15 oz. package; 50 cubic feet for 16 oz. package; 55.8 cubic feet for 18 oz. package; 62.5 cubic feet for 20 oz. package; 75 cubic feet. for 24 oz. package; 100.0 cubic feet for 32 oz. package; 150 cubic feet for 48 oz. package]. Each single use packet of mothballs can treat up to [12.4 cubic feet for 4 oz. packet; 15.6 cubic feet for 5 oz. packet; 18.6 cubic feet for 6 oz. packet; 21.8 cubic feet for 7 oz. packet; 24.8 cubic feet for 8 oz. packet]. Apply product in clean, airtight containers, bags and closets.

Calculate the volume in cubic feet of the storage container or closet by multiplying the height times the width times the depth of the space. For example, the volume of a trunk measuring 4 ft. long by 2 ft. wide by 3 ft. high would be 24 cubic feet.

Below are the volumes of [typical] [common] storage containers and closets:

<u>Storage Space</u>	<u>Volume of Enclosed Space</u>
Average Garment Bag	12 cu. ft.
Jumbo garment bag	18 cu. ft.
Large trunk	24 cu. ft.
Reach-in closet	64 cu. ft.
Walk-in closet	200 cu. ft.

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

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

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. **If empty:** 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 dust or vapors. Harmful if swallowed and harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before use.

Keep out of reach of children. Do not place in areas accessible to children.

FIRST AID	
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.
If swallowed	<ul style="list-style-type: none"> • Immediately call poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
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 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. • 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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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:	00.05%
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.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

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. Do not mix naphthalene or use it together with other moth preventive chemicals. For use only on cloth containing wool or wool blends. To insure protection of clothing, follow the application directions carefully. Do not apply more product than specified for the area being treated. **IMPORTANT: It is illegal to sell the sachets [packets] individually. Do not open sachets [packets].**

NOT FOR USE TO CONTROL SQUIRRELS, BATS AND BIRDS INSIDE 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). Each single use packet of mothballs can treat up to [12.4 cubic feet for 4

oz. packet; 15.6 cubic feet for 5 oz. packet; 18.6 cubic feet for 6 oz. packet; 21.8 cubic feet for 7 oz. packet; 24.8 cubic feet for 8 oz.]. Apply product in clean, airtight containers, bags and closets.

Calculate the volume in cubic feet of the storage container or closet by multiplying the height times the width times the depth of the space. For example, the volume of a trunk measuring 4 ft. long by 2 ft. wide by 3 ft. high would be 24 cubic feet.

Below are the volumes of [typical] [common] storage containers and closets:

<u>Storage Space</u>	<u>Volume of Enclosed Space</u>
Average Garment Bag	12 cu. ft.
Jumbo garment bag	18 cu. ft.
Large trunk	24 cu. ft.
Reach-in closet	64 cu. ft.
Walk-in closet	200 cu. ft.

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 and 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 Handling:

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. May be fatal if inhaled. Do not breathe dust or vapors. Harmful if swallowed and harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before use.

Keep out of reach of children. Do not place in areas accessible to children.

FIRST AID	
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.
If swallowed	<ul style="list-style-type: none"> • Immediately call poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
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 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. • 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 Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	

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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3. SUB-LABEL – 4, 6, 8 oz. moth ball stations

Optional Marketing Claims for Use with Pre-filled Stations

1. New (to be used for six months after first marketing of prefilled stations)
2. 4 Stations Pre-filled with Trusted Enoz Old Fashioned Moth Balls
3. 6 Stations Pre-filled with Trusted Enoz Old Fashioned Moth Balls
4. 8 Stations Pre-filled with Trusted Enoz Old Fashioned Moth Balls
5. Durable
6. Pre-filled
7. Repellent Stations
8. Pre-filled Moth Ball Repellent Stations
9. Durable [Moth Ball] Stations
10. Durable Pre-filled [Moth Ball] Stations
11. No-touch
12. No handling
13. No [direct] contact with skin
14. No waste!
15. No mess no guess!
16. Takes the guesswork out of using moth balls
17. Pre-filled for optimum effectiveness
18. Pre-filled for efficiency
19. Easy to Use
20. Contains x – y oz. Stations (x = count, y = ounces/station)
21. Contains x Stations (x = count)

FRONT PANEL

ENOZ® Old Fashioned Moth Balls

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

**KEEP OUT OF REACH OF CHILDREN
WARNING**

See side panels for additional precautionary statements.

Net Weight: 4 oz.(113g) or 6 oz.(170g) or 8 oz.(226g)

[BACK PANEL]

Directions for Use:

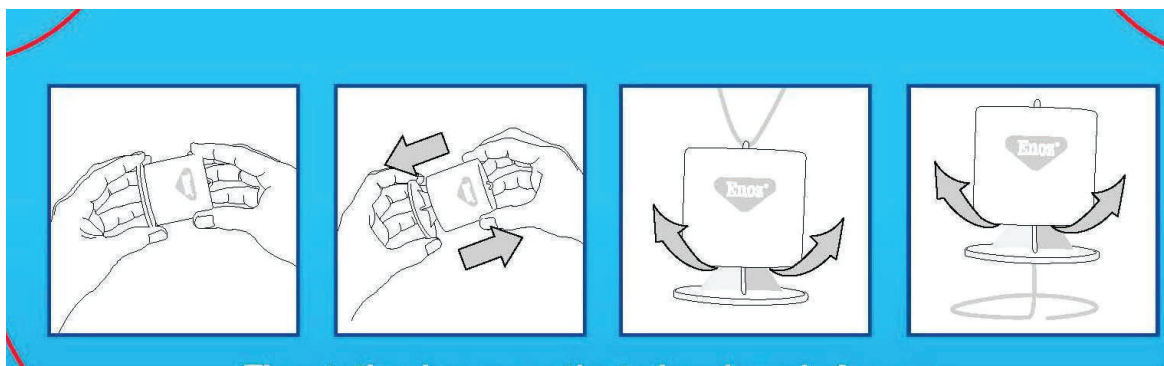
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

ACTIVATING STATION

Remove Moth Ball Station from package and place one hand on the top section of the station and the other hand on the bottom section.

To activate the station, pull the two sections away from each other until they click into position. Place stations in storage containers or use optional wires to hang or stand the stations in areas consistent with the label Use Directions.



The station is now activated and ready for use. Repeat these steps for each station.

Protect in Summer and Winter.

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. Do not mix naphthalene or use it together with other moth preventive chemicals. For use only on cloth containing wool or wool blends. To insure protection of clothing, follow the application directions carefully. Do not apply more product than specified for the area being treated.

IMPORTANT: It is illegal to sell the stations individually. Do not take apart stations.

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

Application Directions: The moth ball stations in this package can treat up to [12 cubic feet] (for 4 oz. package) [18 cubic feet] (for 6 oz. package) [24 cubic feet] (for 8 oz. package). Each single use moth ball station can treat up to 3 cubic feet. Apply product in clean, airtight containers, bags and closets.

Calculate the volume in cubic feet of the storage container or closet by multiplying the height times the width times the depth of the space. For example, the volume of a container measuring 2 ft. long by 2 ft. wide by 3 ft. high would be 12 cubic feet.

Below are the volumes of common storage containers and closets:

<u>Storage Space</u>	<u>Volume of Enclosed Space</u>
Average Garment Bag	12 cu. ft
Jumbo garment bag	18 cu. ft.
Large trunk	24 cu. ft.

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

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

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse or refill this container. **If empty:** 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.

[LEFT SIDE PANEL]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. May be fatal if inhaled. Do not breathe dust or vapors. Harmful if swallowed and harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before use.

Keep out of reach of children. Do not place in areas accessible to children.

Precautionary statements continued on right side panel.

[RIGHT SIDE PANEL]

FIRST AID

If inhaled

- 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.

If swallowed

- Immediately call poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give **any** liquid to the person.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing

- 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 in eyes

- 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.
- 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 Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

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-CHN-1

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Made in China

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