9/17/2013

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OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001



SEP 17 2013

Kathie Tryson Willert Home Products 4044 Park Avenue St. Louis, MO 63100

Subject:

Amendment to add a new sublabel for new plastic stations EPA Registration No. 1475-74 Primary Brand Name: ENOZ Old Fashioned Moth Balls Submission Date: <u>September 3, 2013</u>

Dear Ms. Tryson:

The label referred to above, submitted under FIFRA, as amended, is **acceptable**. Please submit one final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at <u>benbow.gene@epa.gov</u>.

Sincerely,

Reuben Baris Acting Product Manager (07) Insecticide-Rodenticide Branch Registration Division (7504P)

#### MASTER LABEL – ENOZ.® OLD FASHIONED MOTH BALLS

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# MASTER LABEL

# ENOZ<sup>®</sup> 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 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 and 24 oz. sizes Optional Marketing Claims for Use with Wrapped Product

1. New! (to be used for six months after first marketing of wrapped product)

2. New packets! (to be used for six months after first marketing of wrapped product)

3. Now wrapped for easy use!

4. Now wrapped for convenience!

5. Wrapped for your protection

6. No-touch

7. No handling

8. No [direct] contact with skin

9. Protective wrap - no direct contact with skin

10. Breathable film allows moth control to pass through and provides a barrier against contact with skin.

11. Protective breathable wrap provides barrier against direct skin contact

12. Protective wrap - effective barrier against skin contact

13. Pre-measured packets

14. Accurate pre-measured packets

15. Ideal size packets

16. Single use [breathable] packets

17. Packets are ideal size for consumer storage spaces

18. No waste!

19. No mess no guess!

20. Takes the guesswork out of using mothballs

21. Premeasured for optimum effectiveness

22. Premeasured for efficiency

23. Measured quantity delivers [exact] amount necessary to kill moths, their eggs and larvae

24. New! Convenient single use packets (New! to be used for six months after first marketing of wrapped product)

25. New Packets! Convenient single use packets (New! to be used for six months after first marketing of wrapped product)

26. Convenient single use packets

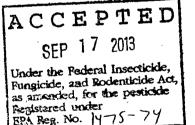
27. Contains [x] packets [x=number of packets in container]

28. Contains [x] [y] oz. packets [x=number of packets in container, y = size of inner packet]

29. New Packets [x] [y] oz. Convenient Single Use Packets! (New to be used for six months after first marketing of wrapped product) [x=number of packets in container, y = size of inner packet]

[bracketed text] = optional language

EPA Reg. No. 1475-74



MASTER LABEL – ENOZ.® OLD FASHIONED MOTH BALLS

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# **FRONT PANEL:**

# **ENOZ<sup>®</sup> 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 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.)

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

# [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 4 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:

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

200 cu ft

#### MASTER LABEL – ENOZ. OLD FASHIONED MOTH BALLS

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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.

# MASTER LABEL – ENOZ.® OLD FASHIONED MOTH BALLS

FIRST AID	
If inhaled	<ul> <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>
If swallowed	<ul> <li>Immediately call poison control center or doctor.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give any liquid to the person.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul> <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 in eyes	<ul> <li>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.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
HOT LINE NUMBER	
treatment. You ma	or label with you when calling a poison control center or doctor, or going for ay also contact the National Pesticide Information Center (NPIC) at 1-800- gency 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	Willert Home Products
EPA Est. No. 1475-WV-1	4044 Park Ave.
· · ·	St. Louis, MO 63110 ©2013

## 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.

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

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# MASTER LABEL – ENOZ. ® OLD FASHIONED MOTH BALLS

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:

Storage Space	Volume of Enclosed Space
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  $176^{\circ}$  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 mersacessible to children.

FIRST AID	
If inhaled	<ul> <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>
If swallowed	<ul> <li>Immediately call poison control center or doctor.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give any liquid to the person.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul> <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 in eyes	<ul> <li>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.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
	HOT LINE NUMBER
Have the containe	er or label with you when calling a poison control center or doctor, or going for

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<sup>®</sup> Old Fashioned Moth Balls

ACTIVE INGREDIENT: Naphthalene	99.95%
OTHER INGREDIENTS:	<u>00.05%</u>
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)

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[bracketed text] = optional language

EPA Reg. No. 1475-74

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# [BACK PANEL]

#### **Directions for Use:**

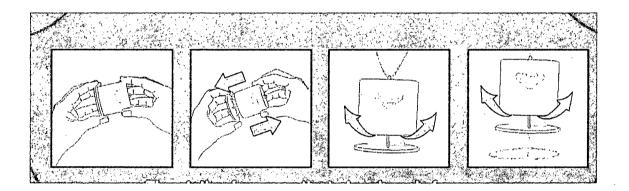
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### 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:

Storage Space	Volume of Enclosed Space
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.

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# [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.

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Made in China

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