

PM 32

1475-90

9/30/98

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SEP 30 1998

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

Ref: ENOZ Cedar Tree  
EPA Reg. No. 1475-90  
CSF and Revised Label

Dear Ms. Hantak:

We have received the above revised labeling and Confidential Statement of Formula (CSF), submitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The results of our review of these documents follow.

A. Revised Labeling. The labeling referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before you ship product:

1. Since the product is less than 16 ounces, remove all references to closet because there is not enough product to treat an entire closet.
2. Change the statement "Prevents moth infestation regardless of fabric type" to "For use only on cloth containing wool or wool blends."
3. In application directions, replace "Take off cellophane wrap...replace cake in box" to "Unwrap the cake, and while holding it by its cellophane wrapper, transfer it back to the box."
4. Replace the statement "To aid in control of mildew: Use 1 cake to every 20 cubic ft. of tightly enclosed space" with "Aids in mildew control" because the rate of application must be no more than 1 pound of product per 50 cubic feet of tightly-enclosed space.
5. Add the "Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage."
6. In the storage and disposal section, correct the statement "do not empty container..." to "do not *reuse* empty container..."

7. Revise the Ingredient Statement as follows:

<b>ACTIVE INGREDIENT:</b>	
Paradichlorobenzene . . .	.99.59%
<b>INERT INGREDIENTS:</b> . . .	<u>0.41%</u>
<b>TOTAL</b>	<b>100.00%</b>

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

B. Revised CSF. The Agency has determined that the Confidential Statement of Formula (CSF) dated May 19, 1998, as amended, is *acceptable*. A copy of this CSF has been retained in our files for this product. All previous versions are obsolete. If you have any questions, please contact Amy Caicedo on (703) 308-9399.

C. Request for Additional Brand Names. In response to your request to add additional brand names to EPA Reg No. 1475-90, the request is denied per EPA's Label Review Manual, EPA737-B-96-001, page 12-2. This is because the products you list in your letter dated May 20, 1998, are already registered EPA products so they can not be registered also as EPA Reg No. 1475-90.

Sincerely yours,



Dan Peacock, Biologist  
Insecticide, Rodenticide Branch  
Registration Division (7505C)

Enclosure: stamped label

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3 9 8

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

SEP 30 1998

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
recommended for the pesticide  
registered under EPA Reg. No.

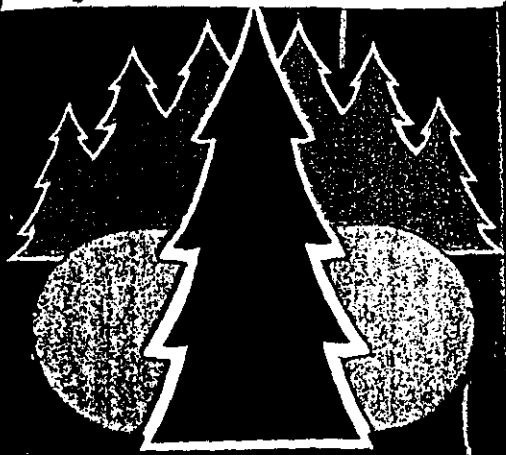
1475-90



FRESHENS LIKE A CEDAR CHEST

# CEDAR TREE

NO CLINGING ODOR PREVENTS MILDEW  
KILLS Clothes Moths, Eggs, Larvae  
in Air-Tight Containers and Storage Closets



KEEP OUT OF REACH OF CHILDREN.  
WARNING: SEE BACK PANEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS.

ACTIVE INGREDIENT: Paradichlorobenzene	99.65%	NET WT. 4 oz. (113.36g.)
INERT INGREDIENTS:	.35%	
TOTAL:	100.00%	

OK? less than 1 lb



**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 CARPET BEETLES**

**Restrictions:** Kills clothes moths (larvae and adults) and carpet beetles in clean, airtight containers (e.g., chests and trunks) and garment bags. Do not use in containers, cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. As ~~Paradichlorobenzene~~ damages some plastics, use only in 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. *OK?*

**Application Directions:** ~~Open flap, remove moth cake from box. Take off cellophane wrap, replace cake in box.~~ Attach box at top of garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake for 12.5 cubic feet of confined space. For a garment bag, multiply the width, depth and length and divide by 5400\* to determine the number of ounces of product needed. For example, a garment bag 54" long, 32" wide and 16" deep (i.e. 27,648 cubic inches) would need 5.1 ounces of product.

**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.

**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. Drink promptly a large quantity of water. Avoid alcohol. Probable mucosal damage may contraindicate the use of gastric lavage.

**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.

**STORAGE AND DISPOSAL:**  
**Storage:** Store only in original container, in a cool, dry place inaccessible to children and pets.  
**Disposal:** Do not empty container (or packaging). Securely wrap in newspaper and discard in trash.



E.P.A. Reg. No. 1475-90  
 E.P.A. Est. 1475-MO-1



Willert Home Products  
 4044 Park St. Louis, MO 63110

No. 139

*Handwritten calculations:*  

$$\frac{16}{SD}$$

$$\frac{200}{12.5}$$

*Handwritten symbols and markings:*  
 A series of vertical and horizontal lines resembling a barcode or scanning artifact on the right edge of the page.

5 7 8

**COMPOSITE LABEL**  
**ENOZ CEDAR TREE**  
**EPA REG. NO. 1475-90**  
**EPA EST. 1475-MO-1**

**FRONT PANEL -**  
**FRESHENS LIKE A CEDAR CHEST**

**NO CLINGING ODOR PREVENTS MILDEW**  
**KILLS Clothes Moths, Eggs, Larvae**  
**in Air-Tight Containers and Storage Closets**

**KEEP OUT OF REACH OF CHILDREN.**  
**WARNING: SEE BACK PANEL FOR ADDITIONAL**  
**PRECAUTIONARY STATEMENTS.**

**ACTIVE INGREDIENT: Paradichlorobenzene 99.65%**  
**INERT INGREDIENTS: .35%**  
**TOTAL: 100.00%**

- NET WT. 4 OZ. (ENOZ CEDAR TREE)**
- NET WT. 4 OZ. (ENOZ CEDAR SCENTED MILDEW CAKE)**
- NET WT. 4 OZ. (ENOZ CEDAR-IZE MOTH CAKE)**
- NET WT. 5 1/2 OZ. (REEFER-GALLER CEDAR WOOD)**
- NET WT. 6 OZ. (REEFER-GALLER NO MILDEW CAKE)**

**BACK PANEL -**

**DIRECTIONS FOR USE: (ENOZ Cedar Tree) No. 139 (ENOZ CEDAR SCENTED MILDEW CAKE) No. KM-8(ENOZ CEDAR-IZE MOTH CAKE) No. C-38 - 4 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**

**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, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. As Paradichlorobenzene damages some plastics, use only in polyethylene or polypropylene containers.**

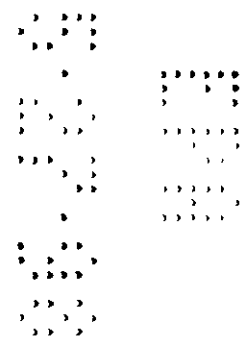
**Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected. Prevents moth infestation regardless of fabric type.**

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

**SEP 30 1998**

*Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.*

1475 90



Application Directions: Open flap, remove moth cake from box. Take off cellophane wrap...replace cake in box. Attach box at top of garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake for 12.5 cubic feet of confined space. For a garment bag, multiply the width, depth and length and divide by 5400<sup>3</sup> to determine the number of ounces of product needed. For example, a garment bag 54" long, 32" wide and 16" deep (i.e. 27,648 cubic inches) would need 5.1 ounces of product.

product needed. To aid in control of mildew: Use 1 cake for 8 cubic feet of tightly enclosed space.

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.

**DIRECTIONS FOR USE: (REEFER-GALLER Cedar Wood) No. 1401 - 5 1/2 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**

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, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. As Paradichlorobenzene damages some plastics, use only in 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.

Application Directions: Open flap, remove moth cake from box. Take off cellophane wrap...replace cake in box. Attach box at top of garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake for 17.5 cubic feet of confined space. Multiply the width, depth and height. For example, a storage unit 3 ft wide, 1.3 ft deep and 4.5 ft long (i.e. 17.55 cubic feet) would need 5.5 ounces of product. To aid in control of mildew: Use 1 cake for 12 cubic feet of tightly enclosed space.

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.

**DIRECTIONS FOR USE: (REEFER-GALLER NO MILDEW CAKE) No. 1210 - 6 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**

**Use Restrictions:** Kills clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g., chests and trunks) garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. As Paradichlorobenzene damages some plastics, use only in 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.

**Application Directions:** Open flap, remove moth cake from box. Take off cellophane wrap...replace cake in box. Attach box at top of garment bag (or hanger) or to a wire, because vapors work downward. Apply product in clean, air-tight containers listed above at the rate of 1 cake for 18.8 cubic feet of confined space. Multiply the width, depth and height. For example, a storage unit 5 ft high, 1.5 ft deep and 2.5 ft wide (i.e. 18.8 cubic feet) would need 5.5 ounces of product. To aid in control of mildew: Use 1 cake for 13 cubic feet of tightly enclosed space.

**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.

**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 preformed on laboratory animals.

**FIRST AID: IF SWALLOWED:** Call a physician or Poison Control Center. Do not induce vomiting. 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.

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 empty container (or packaging). Securely wrap in newspaper and discard in trash.

Willert Home Products  
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