

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 12, 2004

300
17 S-757320

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

Attention: Ms. Susan M. Hantak

- Subject** **ENOZ® Cedar Pine Moth Balls**
EPA Reg. No. 1475-120
Your amended application of May 23, 2003, received March 29, 2004
- Purpose** The purpose of this submission is 1) to revise your label in accordance with PR Notices 2001-1 and 2001-6, and 2) to revise your formula under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- Label** The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided you submit one (1) copy of final printed labeling to us, with the following changes, before you ship your product.
1. Since "Be Safe!" could be interpreted as implied safety claim, change these words to something like "Be Sure!".
 2. Because you have reported the flash point of this product as "88 F", you need to add this "Physical or Chemical Hazards" heading and text:

Physical or Chemical Hazards
Combustible. Do not use or store near heat or open flame.
 3. We suggest that you **bold** these words to give them more prominence: "**STORAGE AND DISPOSAL**", "**Storage**", "**Disposal**", "**If empty**", and "**If partly filed**".
- CSF** We have reviewed your Confidential Statement of Formula (CSF) dated May 23, 2003. Please clarify the relationship between your source and this product. Do you repackage your source or is it actually a starting material?

- Existing stocks** Stocks of existing labels may be used for eighteen (18) months.
- Consequence for non-compliance** 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 constitutes acceptance of these conditions.
- Questions** If you have questions about this letter, please contact me at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



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

- Enclosures**
1. Minimum Type Sizes for Final Printed Labels
 2. Stamped Label
- Letter** Dan Peacock, Disk142,A:\Naphthalene\1475-120, revised label and csf, 4-6-2004.wpd

FRONT PANEL:

ENOZ® Cedar Pine Moth Balls

Kills Clothes Moths, Eggs and Larvae in
Air-Tight Containers and Storage Closets
This product can treat up to 31.2 cu. ft

ACTIVE INGREDIENT: Naphthalene.....	99.85%
INERT INGREDIENTS:	00.15%
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:
APR 12 2004

Net Contents: 10 oz. (283.4 g)

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1475-120

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 31.2 cubic feet. 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.)

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® Cedar Pine Moth Balls. To insure protection of your cloths use the recommended amount of ENOZ® Cedar Pine 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:

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>	

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. 1475-120
EPA Est. No. 1475-WV-1

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