



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Kathie J. Tryson  
Director, Regulatory Affairs  
Willert Home Products  
4044 Park Avenue,  
St. Louis, MO 63044

MAY 30 2008

Subject: Label Notification for Pesticide Registration Notices 2007-4 and 97-6

Dear Ms. Tryson,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notices (PRN) 97-6, 98-10, and 2007-4, dated April 21, 2008 for the product ENOZ<sup>®</sup> Cedar Pine Moth Balls (EPA Registration Number 1475-120). The Registration Division (RD) has conducted its review of this request for its applicability under PRNs 97-6, 98-10, and 2007-4 and finds that the label changes requested fall within the scope of these PR Notices. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0080



	United States	<input type="checkbox"/> Registration	OPP Identifier Number
	Environmental Protection Agency	<input type="checkbox"/> Amendment	
	Washington, DC 20460	<input checked="" type="checkbox"/> Other	

### Application for Pesticide - Section I

1. Company/Product Number 1475-120	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ENOZ Cedar Pine 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 labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels 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 2007-4, 97-6 and 98-10: Addition of "nonrefillable container", "Other ingredients", and rearrangement of text on label panels due to a packaging change. Enclosed are copies of revised labeling with the changes highlighted. Certification on attached cover letter.

### Section - III

1. Material This Product Will Be Packaged In:				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		<input checked="" type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input checked="" type="checkbox"/> Glass	<input checked="" type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container		Other (Specify) <u>plastic bag inside cardboard box</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container <u>5, 6, 10, 12, 14, 16, 24 oz.</u>	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"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kathie J. Tryson	Title Director, Reg. Affairs	Telephone No. (Include Area Code) 314-659-1430
<b>Certification</b> 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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Director, Regulatory Affairs	
4. Typed Name Kathie J. Tryson	5. Date May 28, 2008	



**[RIGHT][LEFT] [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][Right] Side Panel.

**[LEFT][RIGHT][SIDE PANEL:]**

Use Directions continued from [Right][Left] Side Panel.

**Application Directions:** The mothballs in this container can treat up to 31.2 cubic feet (for 10 oz. box) [15.62 cubic feet for 5 oz. box; 18.75 cubic feet for 6 oz. box; 37.5 cubic feet for 12 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® Cedar Pine Moth Balls. To insure protection of your clothes 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.

[Bracketed Text] = optional language

### STORAGE AND DISPOSAL

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

**Disposal: If empty:** Nonrefillable 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.

[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"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person drink several glasses of water.</li> <li>• Do not induce vomiting.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <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 inhaled	<ul style="list-style-type: none"> <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>
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.



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# WILLERT HOME PRODUCTS

## NOTIFICATION PER PR NOTICES 2007-4 & 97-6

April 21, 2008

Mr. John Hebert, Product Manager 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 Changes per PR Notices 2007-4, 97-6 & 98-10  
ENOZ<sup>®</sup> Cedar Pine Moth Balls  
EPA Reg. No. 1475-120

Dear Mr. Hebert:

Enclosed please find our Notification of label change per PR Notice 2007-4 to add "Nonrefillable container" to the Disposal section. We are also taking this opportunity to change "Inert ingredients" to "Other ingredients" per PR Notice 97-6, and rearrange the placement of Directions for Use on the side panels due to a packaging change as allowed by PR Notice 98-10. 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](mailto:ktryson@willert.com) if you need further information. Thank you very much for your attention to our amendment.

Sincerely,

Kathie J. Tryson  
Director, Regulatory Affairs

