

1475-145

PM-4

4-22-98

1044

$$\frac{300}{17} = 53809$$

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

APR 22 1998

Attention: Ms. Susan M. Hantak

Subject: Naphthalene
EPA Reg. No. 1475-145
Your amended application of letter of January 19, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes and submit one (1) copy to us before you ship your product:

1. If you wish to include the Chemical Abstracts (CAS) Registry Number "91-20-3" on your label, place it in the Ingredient Statement, under "Naphthalene", as indicated below:
2. Correct the percentages of ingredients in the Ingredient Statement as indicated below:

ACTIVE INGREDIENT:

Naphthalene 99.95 %

(CAS # 91-20-3)

INERT INGREDIENTS: 0.05 %

TOTAL 100.0%

3. Change "FOR REPACKAGING ONLY NOT FOR RESALE UNDER THIS LABEL"
TO "An Insecticide for Reformulating and Repackaging into Registered End-Use
Products for Moth Control".

4. Correct your use directions as follows:

DIRECTIONS FOR USE

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

An insecticide only for formulating and repackaging into registered end-use products for moth control. Manufacturers, formulators, and repackagers must obtain their own EPA registration numbers.

5. Place the existing "ENVIRONMENTAL HAZARDS" after the "FIRST AID" and "EMERGENCY TELEPHONE NUMBER" sections.
6. Revised your "STORAGE AND DISPOSAL" section as follows:

STORAGE AND DISPOSAL [12 pt type]

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store only in a cool, dry place inaccessible to children and pets. Do not store at elevated temperatures. Material melts at 176 Deg F. In case of spill or leak, sweep up or shovel into clean metal containers. Dispose of pesticide and container as indicated below.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate 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 DISPOSAL: [See Appendix A on Page 7 of PR NOTICE 83-3.]

7. Move your emergency telephone number just below the "FIRST AID" section and include the type of information provided and the days and hours of operation, as follows:

EMERGENCY TELEPHONE NUMBER

For information on [emergencies, product usage, etc.], call 1-800-424-9300 [days and hours of operation].

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.

A stamped copy of the labeling is enclosed for your records.

In reviewing the labeling for this product, we note that your label contains the statement, "This pesticide is toxic to fish.", which we required in our March 27, 1995, letter. As some Naphthalene products have this text and others do not, do you know the basis of this statement?

Sincerely yours,



Dan Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (H7504C)

Enclosures: 1. Stamped Label
2. A-79 Enclosure
3. Container Disposal Statements

Peacock WP#16:A:\Naphtha\1475-145.apr:305-5407:4/22/98

NAPHTHALENE

CAS #91-20-3

WILLERT HOME PRODUCTS

FOR REPACKAGING ONLY NOT FOR RESALE UNDER THIS LABEL

PRECAUTIONARY STATEMENTS:

~~HAZARD TO HUMAN AND DOMESTIC ANIMALS.~~ WARNING: May be fatal if inhaled. Harmful if swallowed. Avoid breathing vapors or dust. Avoid contact with skin, or clothing.

~~ACCEPTED~~
with COMMENTS
in EPA Letter Dated:
FIRST AID:

APR 22 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, footwatericide is registered under EPA Reg. No. 1475-145

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF SWALLOWED: Call a physician or Poison Control Center. Drink one or two glasses of water to induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of water. Call a physician if irritation persists.

NOTE TO PHYSICIAN:

If breathing is difficult, give oxygen.

KEEP OUT OF REACH OF CHILDREN

WARNING

ACTIVE INGREDIENT: Naphthalene	99.90%
INERT INGREDIENTS:	0.10%
TOTAL:	100.00%

Distributed by:
WILLERT HOME PRODUCTS, INC.
4044 Park Avenue
St. Louis, MO 63110

NET WT. 200 LBS.
90 KILOGRAMS

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. FOR USE BY MANUFACTURERS, FORMULATORS AND REPACKAGERS ONLY. When this product is prepared as an end use pesticide, manufacturers, formulators and repackagers must obtain their own EPA Registration Number.

• ENVIRONMENTAL HAZARDS:

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

• STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Material will melt at 176°F. Do not store at elevated temperatures. In case of spill or leak, sweep up or shovel into clean metal containers. Disposal of pesticide and container in accordance with instructions provided under DISPOSAL below.

• CONTAINER DISPOSAL:

Completely empty container. Then dispose of empty container in a sanitary landfill or by incineration. Empty container retains vapors and product residue. Observe all labeled safeguards until container is destroyed.

EMERGENCY TELEPHONE NUMBER
(800) 424-9300

EPA REG. NO. 1475-145
EPA EST. 1475-WV-1

1475