

1475-159

02/26/2009

1/9



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mrs. Kathie J. Tryson  
Director, Regulatory Affairs  
Willert Home Products  
4044 Park Avenue  
St. Louis, MO 63110

FEB 26 2009

Re: Notification per PR Notice 98-10: Alternate format for Directions of Use and First Aid for small package size: Same text but fewer numbered steps and graphics in Directions for Use, and paragraph format for First Aid.

EPA Registration No.: 1475-159

Date of Submission: December 19, 2008

Dear Mrs. Tryson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, December 19, 2008, for the product Willert Mosquito Coils. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1475-159	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Willert Mosquito Coils	PM# 10	
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: <b>NOTIFICATION</b> EPA Reg. No. <u>FEB 26 2009</u> 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 Notice 98-10: Alternate format for Directions for Use and First Aid for small package size: Same text but fewer numbered steps and graphics in Directions for Use, and paragraph format for First Aid. See cover letter for details and certification.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Metal Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

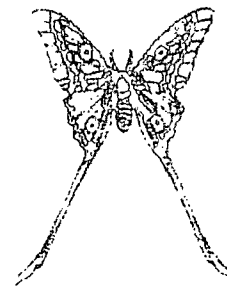
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Kathie J. Tryson	Title Director, Reg. Affairs	Telephone No. (Include Area Code) 314-659-1430
<b>Certification</b> I certify that the statements I have made 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 December 19, 2008	

# WILLERT HOME PRODUCTS

## NOTIFICATION PER PR NOTICE 98-10

December 19, 2008

Mr. Richard Gebken, Product Manager 10  
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 per PR Notice 98-10  
Willert Mosquito Coils, EPA Reg. No. 1475-159**

Dear Mr. Gebken:

Enclosed please find our Notification of label change per PR Notice 98-10 to add *optional* condensed formats for Directions for Use and First Aid in order to fit all required text onto a small package for retail sale. The Directions for Use include the same words as the original version, but have been condensed from six steps into three, and one optional graphic has been eliminated. The First Aid section is presented in a paragraph format, instead of boxed, but still contains bolded headings so consumers can quickly find the information they need. These optional formats have been included for both the outer carton and the inner coil wrapper. The following documents are included:

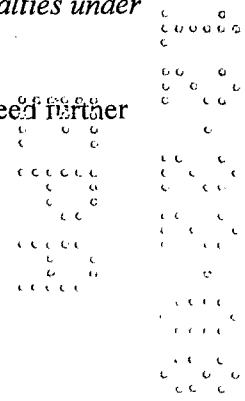
1. One application on EPA Form 8750-1
2. Two copies of revised labeling, plus another copy with the additions highlighted.
3. One copy of our most recent stamped accepted label dated October 22, 2008, and Final Printed Labeling submitted November 5, 2008, for your reference.

*This notification is consistent with the guidance in PR Notice 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 314-659-1430 or email me at [ktryson@willert.com](mailto:ktryson@willert.com) if you need further information. Thank you very much for your attention to this correction.

Sincerely,

  
Kathie J. Tryson  
Director, Regulatory Affairs



Outer Carton - Front Panel

### Willert Mosquito Coils

Optional Marketing Claims:

- Repels Mosquitoes [outdoors]
- Each coil burns [for] 5-7 hours [outdoors][!]
- Burns 5-7 hours
- Repels mosquitoes for hours
- Burns for hours
- For outdoor use
- Outdoors place one coil every 10 feet
- Use on patios and unenclosed porches
- Use on patios, decks, unenclosed porches, cabanas, and campsites
- Use for: patios, unenclosed porches & backyards
- Refills available [for reusable pot label]
- 4 Pack

**NOTIFICATION**

**FEB 26 2009**

Active Ingredient: d-cis/trans allethrin.....0.25%  
 Other Ingredients:.....99.75%  
 [Total: .....100.00%]

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION:**

See back for additional precautionary statements and directions for use.

Contains Four 0.44 oz. (12.5 g) Coils  
 Total Net Weight: 1.76 oz. (50 g)

[Also includes [two metal stands][reusable pot]]

[bracketed text] = optional language

Outer Carton - Back Panel

[Optional Marketing Paragraph:]

[Willert Mosquito Coils help repel mosquitoes in outdoor areas such as patios, unenclosed porches, and campsites.]

**DIRECTIONS FOR USE:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor residential use only.*

[Option #1 – for coils sold with metal stands]

1. Coils are nested together. Gently flex until the rings loosen. Grasp each comma-shaped end in the center and carefully pull coils apart. [graphic]
2. Bend center piece of metal stand to upright position. [graphic]
3. Insert top of stand into slot in center of coil. [graphic]
4. Light outer end of coil until it glows. [graphic]
5. **Blow out any flame and allow coil to smolder. Do not touch lit end of coil.**
6. Place coils 6 – 10 feet apart around area to be protected.

Coils will burn for 5-7 hours in calm air. Do not use in windy areas. If shorter period of use is desired, break coil into smaller pieces and place in notched cut of metal stand. Cover or remove all exposed food, feed and drinking water. To extinguish the coil, carefully remove the smoldering coil from the stand and snuff it out by firmly pressing the glowing end into an ashtray or other nonflammable surface. Never use water to extinguish the coil.

**Do not use indoors. Do not touch lit end. Never leave burning coil unattended. Do not place in direct contact with flammable surfaces. Place lit coils out of reach of children and pets.**

[Option #1A – Condensed into Three Steps and Three Graphics for Small Package]

1. Coils are nested together. Gently flex until the rings loosen. Grasp each comma-shaped end in the center and carefully pull coils apart. [graphic]
2. Bend center piece of metal stand to upright position. Insert top of stand into slot in center of coil. [graphic]
3. Light outer end of coil until it glows. [graphic] **Blow out any flame and allow coil to smolder. Do not touch lit end of coil.** Place coils 6 – 10 feet apart around area to be protected.

Coils will burn for 5-7 hours in calm air. Do not use in windy areas. If shorter period of use is desired, break coil into smaller pieces and place in notched cut of metal stand. Cover or remove all exposed food, feed and drinking water. To extinguish the coil, carefully remove the smoldering coil from the stand and snuff it out by firmly pressing the glowing end into an ashtray or other nonflammable surface. Never use water to extinguish the coil.

**Do not use indoors. Do not touch lit end. Never leave burning coil unattended. Do not place in direct contact with flammable surfaces. Place lit coils out of reach of children and pets.**

[Option #2 – for coils sold with reusable pot]

1. Coils are nested together. Gently flex until the rings loosen. Grasp each comma-shaped end in the center and carefully pull coils apart. [graphic]
2. Place coil onto the holder in the base of the mosquito coil pot. Lightly twist the coil so the stem of the pot fits into the slot at the center of the coil. [graphic]
3. Light outer end of coil until it glows. [graphic]
4. **Blow out any flame and allow coil to smolder. Do not touch lit end of coil.**
5. Replace the lid on the pot.
6. Place coils 6 – 10 feet apart around area to be protected.

Coils will burn for 5-7 hours in calm air. Do not use in windy areas. If shorter period of use is desired, break coil into smaller pieces and place on raised surfaces in pot. Cover or remove all exposed food, feed and drinking water. To extinguish the coil, carefully remove the smoldering coil from the pot and snuff it out by firmly pressing the glowing end into the bottom of the pot. Never use water to extinguish the coil.

**Do not use indoors. Do not touch lit end. Never leave burning coil unattended. Do not place in direct contact with flammable surfaces. Place lit coils out of reach of children and pets.**

## STORAGE AND DISPOSAL

[Option #1 – for coils sold with metal stands]

**Storage:** Store in 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.

[Option #2 – for coils sold with reusable pot]

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

**Disposal: If empty:** Nonrefillable container. Do not reuse or refill this container except to burn Willert Mosquito Coils in reusable pot. 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**

**CAUTION:** Harmful if swallowed. Avoid prolonged inhalation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<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>
<b>If in eyes</b>	<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>
<b>If on skin or clothing</b>	<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>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticides Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	

[Optional Paragraph Format for First Aid on Small Package]

**FIRST AID**

**If swallowed:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. **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 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 eye. Call a poison control center or doctor for treatment advice. **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.

**HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticides Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish and shrimp. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

[Made for][Distributed by]  
 WILLERT HOME PRODUCTS  
 4044 Park  
 St. Louis, MO 63110  
 EPA Reg. No. 1475-159  
 EPA Est. No. 75073-PAR-1  
 [Coils][Made in Paraguay]

### Coil Wrapper Label

#### **Willert Mosquito Coils**

Active Ingredient: d-cis/trans allethrin.....0.25%  
 Other Ingredients:.....99.75%  
 [Total: .....100.00%]

#### **KEEP OUT OF REACH OF CHILDREN**

**CAUTION** See outer carton for additional precautionary statements and directions for use.

[Contains Four 0.44 oz. (12.5 g) Coils]

Total Net Weight: 1.76 oz. (50 g)

#### **DIRECTIONS FOR USE:**

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

*For outdoor residential use only.*

1. Coils are nested together. Gently flex until the rings loosen. Grasp each comma-shaped end in the center and carefully pull coils apart. [graphic]
2. Bend center piece of metal stand to upright position. [graphic]
3. Insert top of stand into slot in center of coil. [graphic]
4. Light outer end of coil until it glows. [graphic]
5. **Blow out any flame and allow coil to smolder. Do not touch lit end of coil.**
6. Place coils 6 – 10 feet apart around area to be protected.

Coils will burn for 5-7 hours in calm air. Do not use in windy areas. If shorter period of use is desired, break coil into smaller pieces and place in notched cut of metal stand. Cover or remove all exposed food, feed and drinking water. To extinguish the coil, carefully remove the smoldering coil from the stand and snuff it out by firmly pressing the glowing end onto an ashtray or other nonflammable surface. Never use water to extinguish the coil. **Do not use indoors. Do not touch lit end. Never leave burning coil unattended. Do not place in direct contact with flammable surfaces. Place lit coils out of reach of children and pets.**

[Optional Format – Condensed into Three Steps and Three Graphics for Small Package]

1. Coils are nested together. Gently flex until the rings loosen. Grasp each comma-shaped end in the center and carefully pull coils apart. [graphic]
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**Do not use indoors. Do not touch lit end. Never leave burning coil unattended. Do not place in direct contact with flammable surfaces. Place lit coils out of reach of children and pets.**



**STORAGE AND DISPOSAL**

**Storage:** Store in 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.

**PRECAUTIONARY STATEMENTS****HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if swallowed. Avoid prolonged inhalation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**FIRST AID**

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