

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 5, 2015

Kathie Tryson Willert Home Products 4044 Park Avenue St. Louis, MO 63100

Subject: Label Notification per PRN 98-10 – Add several marketing claims to the label

Product Name: ENOZ REPELLENT STATIONS

EPA Registration Number: 1475-160 Application Date: October 20, 2014

Decision Number: 497179

Dear Ms. Tryson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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, you may contact Gene Benbow at 703-347-0235 or via email at Benbow.Gene@epa.gov.

Sincerely,

Mark Suarez

Product Manager 07

Invertebrate & Vertebrate Branch 3

Registration Division (7505P) Office of Pesticide Programs

NOTIFICATION

1475-160

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/05/2015

MASTER LABEL

ENOZ® REPELLENT STATIONS EPA Reg. No. 1475-160

This Master Label contains two (2) sub-labels for the following products:

Enoz Repellent Stations: Contains 4, 6, or 8 one-ounce repellent stations

Enoz Repellent Station Refills Contains 16, 24, or 32 one-ounce packets to refill repellent stations

Sub-Label #1

ENOZ® REPELLENT STATIONS

FRONT PANEL

Optional Marketing Claims

- 1. New (to be used for six months after first marketing of product)
- 2. For Repelling Rabbits, Deer, Tree Squirrels, Bats, Dogs and Cats
- 3. Rabbit, Deer, Tree Squirrel, Bat, Dog and Cat Repellent
- 4. Rabbit and Deer Repellent
- 5. Squirrel and Bat Repellent
- 6. Repels Squirrels and Bats from Attics.
- 7. Repels Deer, Rabbits, Squirrels & Bats
- 8. Repel Deer and Rabbits from Hostas, Gardens, Flower Beds & Potted Plants
- 9. Durable
- 10. Pre-filled
- 11. Repellent Stations
- 12. No-touch
- 13. No handling
- 14. No [direct] contact with skin
- 15. No mess no guess!
- 16. Pre-filled for optimum effectiveness
- 17. Pre-filled for efficiency
- 18. No-touch pre-filled stations
- 19. Refillable with Enoz Repellent Station Refills
- 20. Refillable
- 21. Easy to Use
- 22. Contains x 1 oz. Stations (x = count)
- 23. Contains x Stations (x = count)
- 24. Will not Wash Away
- 25. Weatherproof Stations protect repellent for ongoing effectiveness
- 26. Weatherproof Won't Wash Away
- 27. Weatherproof, camouflaged stations seamlessly blend in with the environment for invisible protection that won't wash away.
- 28. Protect Your Plants. Create a No-ZoneTM.
- 29. Patent Pending Design
- 30. Includes Stakes to Hang or Place Stations
- 31. No repellent contact with plants
- 32. 99.95% Naphthalene
- 33. Ready-to-Use
- 34. [4][6][8] Stations Pre-filled with Trusted Enoz Old Fashioned Moth Balls
- 35. Trusted for Generations!
- 36. Protect Your Plants. Money Back Guarantee*

FRONT PANEL (continued)

ACTIVE INGREDIENT: Naphthalene	99.95%
OTHER INGREDIENTS:	<u>00.05%</u>
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements.

Net Weight: 4 oz. (113g) or 6 oz. (170g) or 8 oz. (226g)

BACK PANEL

Directions for Use:

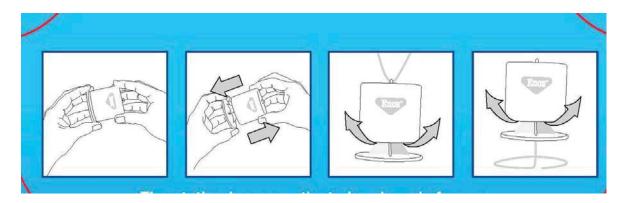
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

ACTIVATING STATION

Remove ENOZ® Repellent Stations from package and place one hand on the top section of the station and the other hand on the bottom section.

To activate the station, pull the two sections away from each other until they click into position. Place stations or use optional wires to hang or stand the stations in areas consistent with the label use directions. Wire hanger can be threaded through loop at top of station (Fig 3) or inserted into hole on bottom of station (Fig 4) to be staked into ground.



The station is now activated and ready for use. Repeat these steps for each station.

TO REPEL RABBITS, DEER, DOGS AND CATS AROUND ORNAMENTAL PLANTS

Use to reduce the frequency of visits by rabbits, deer, dogs and cats to ornamental plants. *For outdoor use only*.

Application Directions: At first sign of growth of roses, spring bulbs, flowers and other plants to be protected, place, hang or stake stations 4 to 8 ft. apart in and around plant area. Avoid contact with foliage or stems.

The proper treatment of large areas may require the use of additional packages of ENOZ® Repellent Stations. To insure protection of your plants, use a sufficient number of ENOZ® Repellent Stations.

Re-treatment: In order to maintain protection of your plants, replace repellent stations when empty or refill stations with Enoz Repellent Station refills. Hot weather and wind may necessitate more frequent replacement.

TO REPEL TREE SQUIRRELS AND BATS IN ATTICS AND WALL VOIDS

Use to repel tree squirrels and bats from attics and wall voids. For indoor use only.

Pre-Application Directions: Calculate the total number of cubic feet to be treated. Divide by 25 cubic feet to determine the number of 1 oz. stations needed.

Application Directions: Each single use ENOZ® Repellent Station can treat up to 25 cubic feet. The repellent stations in this package can treat up to [100 cubic feet] (for 4 oz. package) [150 cubic feet] (for 6 oz. package) [200 cubic feet] (for 8 oz. package). Place stations in accessible areas of attics and wall voids so that they can be easily removed if the odor becomes too strong. The proper treatment of larger areas may require the use of additional packages of ENOZ® Repellent Stations. Replace stations when empty or refill stations with Enoz Repellent Station refills. Remove stations when animals and their signs cease.

Post-Application Directions: Close all openings through which animals gain access to attic and wall voids (such as small crevices, around eaves, rafters, and around dormers) with strips of wood, metal or steel wool.

STORAGE AND DISPOSAL

Pesticide Storage: Store in the original container in a dry place inaccessible to children and pets. **Pesticide Disposal and Container Handling**: Refillable container. Refill this container with Enoz Repellent Station Refills only. Do not use this container for any other purpose. **If empty**: 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

WARNING. May be fatal if inhaled. Do not breathe dust or vapors. Harmful if swallowed and harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before use.

FIRST AID

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 swallowed

- Immediately call poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.

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.

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.
- Call a poison control center or doctor for treatment advice.

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.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water.

Not For Sale in the State of California.

*Money Back Guarantee – If you are not 100% satisfied with this product, Willert Home Products will refund the purchased price of this product. Please send your written request for a refund to the address on the back panel along with the original dated store receipt showing the price paid and the upc code from the package. Please allow 6-8 weeks for processing.

EPA Reg. No. 1475-160 EPA Est. No. 1475-MO-1 Willert Home Products 4044 Park Ave. St. Louis, MO 63110 ©2015

Sub-Label #2

ENOZ® REPELLENT STATION REFILLS

FRONT PANEL

Optional Marketing Claims

- 1. New (to be used for six months after first marketing of product)
- 2. Refills for Enoz Repellent Stations
- 3. Convenient Refills for Enoz Repellent Stations
- 4. Individually wrapped packets for refilling Enoz Repellent Stations
- 5. Each packet refills one Enoz Repellent Station
- 6. For Repelling Rabbits, Deer, Tree Squirrels, Bats, Dogs and Cats
- 7. Rabbit, Deer, Tree Squirrel, Bat, Dog and Cat Repellent
- 8. Repels Deer, Rabbits, Squirrels & Bats
- 9. Rabbit and Deer Repellent
- 10. Squirrel and Bat Repellent
- 11. No-touch
- 12. No [direct] contact with skin
- 13. No mess no guess!
- 14. Easy to Use
- 15. Contains x 1 oz. Refills (x = count)
- 16. Contains x Refills (x = count)
- 17. Will not Wash Away
- 18. Weatherproof Won't Wash Away
- 19. Protect Your Plants. Create a No-ZoneTM.
- 20. No repellent contact with plants
- 21. 99.95% Naphthalene
- 22. Ready-to-Use
- 23. Each [refill][packet] contains [trusted] Enoz Old Fashioned Moth Balls
- 24. Trusted for Generations!

FRONT PANEL (continued)

ACTIVE INGREDIENT: Naphthalene	99.95%
OTHER INGREDIENTS:	<u>00.05%</u>
TOTAL:	100.00%

KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements.

Net Weight: 16 oz. (453 g) or 24 oz. (680g) or 32 oz. (907g)

BACK PANEL

Directions for Use:

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

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

REFILLING STATIONS

Use these packets to refill Enoz Repellent Stations only. Place one hand on the top section of the Enoz Repellent station and the other hand on the bottom section. Pull the two sections away from each other until they come apart. Place one refill packet in the station and then snap back together, making sure to line up the tabs on the inside of the station top with the tracks on the station bottom. Be sure station is in open position before use. [graphic illustration]

Place stations or use wires to hang or stand the stations in areas consistent with the label use directions. Wire hanger can be threaded through loop at top of station or inserted into hole on bottom of station to be staked into ground. [graphic illustration]

TO REPEL RABBITS, DEER, DOGS AND CATS AROUND ORNAMENTAL PLANTS

Use to reduce the frequency of visits by rabbits, deer, dogs and cats to ornamental plants. *For outdoor use only*.

Application Directions: At first sign of growth of roses, spring bulbs, flowers and other plants to be protected, place, hang or stake stations 4 to 8 ft. apart in and around plant area. Avoid contact with foliage or stems.

The proper treatment of large areas may require the use of additional packages of ENOZ® Repellent Stations. To insure protection of your plants, use a sufficient number of ENOZ® Repellent Stations.

Re-treatment: In order to maintain protection of your plants, replace repellent stations when empty or refill stations with Enoz Repellent Station refills. Hot weather and wind may necessitate more frequent replacement.

TO REPEL TREE SQUIRRELS AND BATS IN ATTICS AND WALL VOIDS

Use to repel tree squirrels and bats from attics and wall voids. For indoor use only.

Pre-Application Directions: Calculate the total number of cubic feet to be treated. Divide by 25 cubic feet to determine the number of 1 oz. stations needed.

Application Directions: Each single use ENOZ® Repellent Station can treat up to 25 cubic feet. The repellent station refills in this package can treat up to [400 cubic feet] (for 16 oz. package) [600 cubic feet] (for 24 oz. package) [800 cubic feet] (for 32 oz. package). Place stations in accessible areas of attics and wall voids so that they can be easily removed if the odor becomes too strong. The proper treatment of larger areas may require the use of additional packages of ENOZ® Repellent Stations. Replace stations when empty or refill stations with Enoz Repellent Station refills. Remove stations when animals and their signs cease.

Post-Application Directions: Close all openings through which animals gain access to attic and wall voids (such as small crevices, around eaves, rafters, and around dormers) with strips of wood, metal or steel wool.

STORAGE AND DISPOSAL

Pesticide Storage: Store in the original container in a dry place inaccessible to children and pets. **Pesticide Disposal and Container Handling**: Non-refillable container. Do not reuse or refill this container. **If empty**: 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

WARNING. May be fatal if inhaled. Do not breathe dust or vapors. Harmful if swallowed and harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before use.

FIRST AID

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 swallowed

- Immediately call poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing

- Take off contaminated clothing.
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- Call a poison control center or doctor for treatment advice.

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- 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.
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Combustible. Do not use or store near heat or open flame.

ENVIRONMENTAL HAZARDS

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