

51311-3

11/9/2009

10/10

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 9, 2009

HBC Chemical. Company
c/o Ag-Chem Consulting.
12208 Quinque Lane,
Clifton, VA 20124

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861808
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861811

Attention: Mr. Mathew Brooks

Decision #
419702

Subject	Mothguard EPA Reg. No. 51311-3 Your amended application of August 10, 2009 Your resubmissions of October 28 and November 5, 2009
Purpose	The purpose of this submission is to revise your label to allow for identification of five different scents corresponding to five Confidential Statements of Formula (CSFs), one basic and four alternate formulations.
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, ship your product.
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.

CSF Your revised CSFs, dated October 28 and November 5, 2009, are acceptable. All other versions are obsolete. We have placed a copy of the four CSFs in our files for this product.

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. Stamped label
2. Minimum Type Sizes of Final Printed Labels

Location Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\PDB\51311-G\51311-3, label and CSF, 11-3-2009.doc

- [] - Optional Language

MASTER LABEL

[Paragon Para]

MothGuard

Old Fashioned Moth Balls

[Kills Moths and Carpet Beetles]

[Original Scent]

[Cedar Scent]

[Citrus Scent]

[Floral Scent]

[Lavender Scent]

ACCEPTED NOV 9 2009

Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, for the
pesticide registered under:

51311-3

SUBLABEL – Non-Closet Uses (12, 10, 7, 5, 4 oz. sizes)

SUBLABEL – Storage Closet & Container Uses (16 oz., 24 oz. sizes)

Active Ingredient: Paradichlorobenzene	99.75%
Other Ingredients:	0.25%
Total:	100.00%

EPA Reg #: 51311-3

EPA Est # 51311-IND-002

Manufactured for HBC Chemical
1 S. Middlesex Ave.
Monroe, NJ 08831
Made in India

[Paragon – Household Products, Inc.]

SUBLABEL - Non-Closet Uses (12, 10, 7, 5, 4 oz. sizes)

FRONT LABEL:

**MothGuard
Old Fashioned Moth Balls**

Kills Clothes Moths, Carpet Beetles and Their Eggs and Larvae,
When Used in Air-Tight Containers

This product can treat up to 37.5 cu. ft. (12 oz. container)

31.2 cu. ft. (10 oz. container)

21.9 cu. ft. (7 oz. container)

15.6 cu. ft. (5 oz. container)

12.5 cu. ft. (4 oz. container)

No Clinging Odor!

Active Ingredient: Paradichlorobenzene	99.75%
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Other Ingredients:	0.25%
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Total:	100.00%
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KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

Net Contents:	12 oz. (340.2g)
	10 oz. (283.50g)
	7 oz. (198.45g)
	5 oz. (141.7g)
	4 oz. (113.40g)

BACK LABEL:**DIRECTIONS FOR USE**

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

Use Restrictions: Kills Clothes moths, Carpet Beetles and their eggs and larvae in clean, airtight containers, such as chests, trunks, and garment bags. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventative chemicals. MothGuard Old Fashioned Moth Balls prevents moth infestation regardless of fabric type.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: The mothballs in this container can treat up to 37.5 cu. ft. (12 oz. container) [31.2 cu. ft. (10 oz container); 21.9 cu. ft. (7 oz. container); 15.6 cu. ft. (5 oz. container); 2.5 cu. ft. (4 oz. container)].

One ounce of mothballs or 8 mothballs can treat up to 3 cubic feet of storage space. Examples of the amount of product required for proper treatment are listed below:

4 oz. (32 mothballs)	Average Garment Bag (12 cu. ft.)
5 oz. (40 mothballs)	Large Trunk (15 cu. ft.)

The proper treatment of larger volumes may require the use of larger containers of MothGuard Old Fashioned Moth Balls. To insure protection of your clothes, use the recommended amount of MothGuard Old Fashioned Moth Balls.

Distribute mothballs evenly around and between the folds of stored articles. Keep product in airtight space for a minimum of 7 days. If mothballs have dissipated, add additional mothballs to the container. Odor quickly vanished when articles are aired.

Retreatment: Since moths are active all year, replenish air-tight closets, containers, and bags 2 times a year.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through the skin. Causes eye, skin and respiratory tract irritation. Avoid breathing dust or vapors. Wear safety glasses. Do not get in eyes, skin and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

NOTICE: This product contains a chemical known to the State of California to cause cancer.

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	
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 Network (NPIC) at 1-800-858-7378 for emergency medical treatment information	
NOTE TO PHYSICIAN	
Probably mucosal damage may contraindicate the use of gastric lavage.	

PHYSICAL OR CHEMICAL HAZARD: Combustible. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

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

DISPOSAL: Nonrefillable 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 or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 51311-3
EPA Est. No. 51311-IND-002

Manufactured for
HBC Chemical Co.
1 S. Middlesex Ave.
Monroe NJ 08831

SUBLABEL – Storage Closet & Container Uses (16 oz., 24 oz. sizes)

FRONT LABEL:

**MothGuard
Old Fashioned Moth Balls**

Kills Clothes Moths and Carpet Beetles and Their Eggs and Larvae,
When Used In Storage Closets and Air-Tight Containers
This product can treat up to 50 cu. ft. (16 oz. container)
75 cu. ft./ (24 oz. container)

No Clinging Odor!

Active Ingredient: Paradichlorobenzene	99.75%
Other Ingredients:	0.25%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

See back panel for additional precautionary statements.

Net Contents: 1 lb. (453.60g)
1 lb. 8oz. (630.39g)

Back Label:

DIRECTIONS FOR USE

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

Use Restriction: Kills Clothes moths, Carpet beetles and their eggs and larvae in storage closets and in clean, airtight containers, such as chests, trunks, and garment bags. Do not use dry cleaning bags, garbage bags or other containers that allow vapors to escape into occupied rooms. This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventative chemicals. MothGuard Old Fashioned Moth Balls prevents moth infestation regardless of fabric type.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: The mothballs in this container can treat up to 50 cubic feet (16 oz. container), [75 cubic feet (24 oz. container).

One ounce of mothballs or 8 mothballs can treat up to 3 cubic feet or storage space. Examples of the amount of product required for proper treatment are listed below:

4 oz. (32 mothballs)	Average Garment Bag (12 cu. ft.)
5 oz. (40 mothballs)	Large Trunk (15 cu. ft.)
16 oz.	Small Storage Close (50 cu. ft.)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$). The proper treatment of larger volumes may require the use of additional containers of MothGuard Old Fashioned Moth Balls.

Distribute mothballs evenly around and between the folds of stored articles. Keep product in airtight space for a minimum of 7 days. If mothballs have dissipated, add additional mothballs to the storage closet or container. Odor quickly vanishes when articles are aired.

Retreatment: Since moths are active all year, replenish air-tight closets, containers, and bags 2 times a year.

PRECAUTIONARY STATEMENTS

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

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EPA Reg. No. 51311-3
EPA Est. No. 51311-IND-002

Manufactured for
HBC Chemical Co.
324 Half Acre Rd.
Cranbury, NJ 08512