

70305-2

4/15/2010

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



OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Decision 426019 April 15, 2010

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Chifton, VA 21024

5-864610 $\frac{R340}{1185}$

5-~~863~~233 $\frac{R340}{1185}$

Attention: Matthew Brooks

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your application of October 29, 2009

Purpose The purpose of this submission is to revise your Confidential Statements of Formula (CSF) to reflect two new unregistered sources of active ingredient and to add alternate fragrances, to change the form from balls to bars and cakes, and to revise the label for this product.

CSF You have submitted ten (10) CSFs, dated December 10, 2009, which are acceptable. Copies have been placed in our files. All previous versions are obsolete.

Label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that:

- A. within one (1) year, you submit the following chemistry data for each new source:
 - a. Discussion of Formulation of Impurities (830.1670)
Note: As required for other registrants of PDB, you have to conduct tests for both sources for the impurity of Benzene Hexachloride (BHC), using a method with a Level of Detection (LOD) sensitivity of 0.1%.
 - b. UV/Visible Absorption (830.7050)

Label-continued

- B. you submit one (1) copy of final printed labeling to us, with the following change, before you ship your product.
 - a. We consider that the primary name for this product to be "Paragon Moth Bars" and alternate name to be "Paragon Moth Cakes".
 - b. At the bottom of Page 2, change the text to read: "This product contains 2-3oz cakes [cake form]. This product contains 1-8oz bar per package [bar form]." Do not include both sentences on a single product.

Existing stocks

Stocks of product with existing labels may be used for eighteen (18) months.

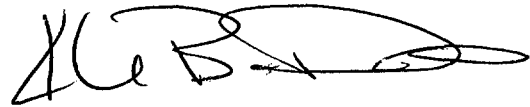
Consequence for non-compliance

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.

Questions

If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock,dan@epa.gov (by E-Mail).

Sincerely yours,



Kable Bo Davis
Acting Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Location

Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\PDB\70305-2\70305-2, Rev CSF, label, 2 new source, new data, 4-14-2010.doc

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**ACCEPTED
With COMMENTS
In EPA Letter Dated: APR 15 2010**

Paragon Moth Bars and Cakes

**Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:**

[Optional Language: Original Scented, Cedar Scented, Lavender Scented, Citrus Scented, ~~Floral Scented~~ 70305-2]

KILLS MOTHS AND CARPET BEETLES

NET WT 8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75%

OTHER INGREDIENTS:.....0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No. 51311-IND-001 70305-NJ-001 51311-PA-001

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**

Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

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 so by a poison control center or doctor. 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 gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, the give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

This product contain 2- 3oz disks or 1 -8 oz bars per package.

Net Wt. 6 oz or 8 oz

DIRECTIONS FOR USE:

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

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

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

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

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).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

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

**PARAGON
HOUSEHOLD PRODUCTS INC.**