

81433-2

10/25/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

October 25, 2007

Mr. Henry M. Jacoby
Agent for IMS Trading, L.L.C.
The Acta Group, LLC
1203 Nineteenth Street, NW Suite 300
Washington, D.C. 20036

Subject: Label Notification

Dear Mr. Jacoby:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 9/26/07 for **EPA Registration 81433-2**. The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-305-6249 or Sherada Hobgood of my staff at 703-308-8893.

Sincerely,

/s/

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0060.

<div style="display: inline-block; vertical-align: middle; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<div style="border: 1px solid black; padding: 2px; display: inline-block;">X</div>	Registration Amendment Other	OPP Identifier Number
Application for Pesticide - Section I				
1. Company/Product Number 81433-2		2. EPA Product Manager Venus Eagle		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMS Moth Balls		PM# 1		
5. Name and Address of Applicant (Include Zip Code) IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 503 Los Angeles, CA 90036 <input checked="" 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: EPA Reg. No. _____ Product Name _____ OCT 25 2007		
Section - II				
<input checked="" 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 type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Minor formulation amendment pursuant to PR Notice 98-10, <i>revised label</i>				
Section - III				
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted				
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"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				
Section - IV				
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Henry M. Jacoby, M.S.		Title Agent		Telephone No. (Include Area Code) (301) 885-9090
Certification 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 President		
4. Typed Name Isaac M. Shapiro		5. Date September 26, 2007		

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant Copy

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ACTA[®]

CHEMICAL PRODUCT DEVELOPMENT
AND DEFENSE

September 28, 2007

Via Hand Delivery

Document Processing Desk (AMEND)
Minor Formulation Review Coordinator (MFRC)
Registration Support Branch
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

10/25 revised label

RE: Minor Formulation Amendments to IMS Moth Balls, EPA Reg. No. 81433-2 and IMS Moth Blocks, EPA Reg. No. 81433-3, Submitted in Accordance with PR Notice 98-10

Dear Document Processing Officer:

On behalf of IMS Trading, L.L.C. (IMS), The Acta Group, L.L.C. is submitting the accompanying amendment applications for the above-referenced products. These amendment applications are submitted in accordance with Pesticide Registration (PR) Notice 98-10, ~~for the addition of one or more fragrances in a formulation. IMS proposes to add, at a concentration of less than one percent, cedar and lavender scents to its currently registered formulations as alternate formulations. Material Safety Data Sheets (MSDS) for the fragrances accompany this submission. We have forwarded more detailed, confidential formulation information from the supplier directly to Mr. Kerry Leifer to include in U.S. Environmental Protection Agency (EPA) files.~~

~~The addition of the fragrances requires a slight adjustment to the nominal active ingredient concentration, so that the percentages will add to 100 percent. Accordingly, for registration numbers 81433-2 and 81433-3, we are submitting revised basic Confidential Statements of Formula (CSF), as well as alternate CSFs for each of the two fragrances, for a total of six CSFs.~~

Additionally, for IMS Moth Balls, Reg. No. 81433-2, the registrant proposes to sell the moth balls alternatively as individual balls, packaged in five-, six-, and ten-ounce boxes as currently done, or in paper packets, each containing two balls; the packets would be sold in

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Tel: 202/266-5020 Fax: 202/557-3836

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Registered in England No. 5307852
Registered office: The Acta Group EU, Ltd. c/o PKF (UK),
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Minor Formulation Review Coordinator
September 28, 2007
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same size boxes as the currently registered product. The paper packets are the same as those used in other currently registered products and are intended to facilitate use by consumers. The grouping of the moth balls into two-ball paper packets does not require a change to the application rate. Proposed changes to address the paper packets are included in the enclosed proposed revised labels.

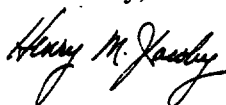
As IMS wishes to continue to sell moth balls with and without the paper packets depending on market demand, and also to sell both the moth balls and moth blocks with and without the fragrances, proposed revisions to the labels for these products are being submitted in a master label format. Proposed alternative language is shown in brackets (*e.g.*, [Lavender Scented Moth Balls], [Cedar Scented Moth Balls]) on the proposed revised labels in the accompanying submission. Proposed changes from the currently approved labels have been made in redline to facilitate EPA's review. A copy of the labels without the redline and including all of the proposed changes are also included in this submission.

Included with this submission are the following:

- EPA forms 8570-1;
- Labels with proposed revisions, five sets of each in redline and one set without redline;
- ~~CSFs for the basic and alternate formulations; and~~
- ~~MSDSs for the fragrances~~

If you have any questions about this submission, please call either me at (301) 865-9090 or Sheryl Lindros Dolan at (202) 266-5031, or Mr. Isaac M. Shapiro, President of IMS, at (323) 939-8868.

Sincerely,



Henry M. Jacoby

Enclosures

OCT 25 2007

V. Draft Labels (5 copies)

Front Panel:

IMS Moth Balls
[Lavender Scented Moth Balls]
[Cedar Scented Moth Balls]
[Paper Covered Lavender Scented Moth Ball Packets]
[Paper Covered Cedar Scented Moth Ball Packets]

Kills Moths & Carpet Beetles

No Clinging Odor
Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to
[57 cu.ft (10 oz)]
[35 cu.ft (6 oz)]
[29 cu.ft (5 oz)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: See Side and Back Panel For Addt'l Precautions

Ingredient Statement:

Active Ingredient: Paradichlorobenzene 99.85%
Other ~~Inert~~ Ingredients: _____ 0.25%
TOTAL: _____ -100.0%

[Net Wt. 10 oz (283.5g)]
[Net Wt. 6 oz (171.2g)]
[Net Wt. 5 oz (141.72.65g)]

IMS Moth Balls provide protection for articles stored in trunks, drawers, boxes, etc. They should be sprinkled or placed on the bottom of the storage space, between the folds and layers of clothes, and on top before securely closing the container.

Right Side Panel:

[Protect in winter and summer and spring and fall.]

[IMS Moth Ball Packets were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. IMS Moth Ball Packets combine an effective mothproofing ingredient with a fresh [lavender] [cedar] scent to create pleasant smelling, reliable moth balls. These pleasant smelling moth balls are wrapped in breathable

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paper packets, which allow the active ingredient to work while protecting you and your clothes from messy flakes or residue.]

Directions for Use

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

Thoroughly brush or clean articles to be stored. Use at rate of [1 box (5 oz) for each 29 cubic feet] [1 box (6 oz) for each 35 cubic feet] [1 box (10 oz) for each 57 cubic feet] of tightly enclosed space.

[Sample Use Rates for Moth Ball Packets:

3 packets Small storage (3 cu.ft)

12 packets Average garment bag (12 cu.ft)

15 packets Large trunk (15 cu.ft)]

[To properly treat larger volumes, the use of additional containers of moth ball packets may be required. Use the recommended amount of moth ball packets to ensure protection of your clothes. Do not remove the moth balls from the packets.]

Distribute IMS Moth Balls evenly around and between the folds of stored articles. Be sure storage space is kept tightly closed at all times and for at least 7 days after protecting with IMS Moth Balls. Replace when moth balls have dissipated.

IMS Moth Balls will not harm the finest woolens, furs, silk, or other fabrics. Pleasant odor quickly vanishes when articles are aired.

Paradichlorobenzene moth balls should not be mixed or placed in contact with Naphthalene moth balls or flakes.

Do not use plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics.

Left Panel:

Distributed by:
IMS Trading, LLC
Los Angeles, CA
Made in China

Back Panel:

Precautionary Statements

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Master Label for EPA Reg. No. 81433-2
Alternative Language Enclosed in Brackets []
Revision: September 25, 2007

Hazards to humans and domestic animals.

WARNING: Causes eye, skin, and respiratory tract irritation. Harmful if swallowed. Avoid contact with skin, eyes, or clothing.

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

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 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 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 further 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.

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 Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Storage and Disposal

Do not reuse empty box or cellophane. Wrap container and put in trash.

Notice:

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

EPA Reg. No. 81433-2
EPA Est. 81217-CHN-001