

81433-2

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



OFFICE OF  
PREVENTION, PESTICIDES,  
AND TOXIC SUBSTANCES

March 8, 2010

Mr. Henry M. Jacoby  
IMS Trading, LLC  
6010 Wilshire Boulevard, Suite 503  
Los Angeles, CA 90036

Dear Mr. Jacoby:

Subject: Amended labeling to add an alternate brand name and make other minor changes  
IMS Moth Balls  
EPA Registration No. 81433-2  
Submission dated February 24, 2010

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On page 1, from the right side panel, delete the phrase "and unwanted residue" so the statement reads, "...provide the excellent protection of moth balls without the strong smell." (Claims about the lack of residue are considered implied safety claims, and are not permissible.)
- On page 1, from the right side panel, delete the phrase "you and" from the last statement so it reads, "...allow the active ingredient to work while protecting your clothes from messy flakes or residue." (Claims that the product protects people are considered implied safety claims, and are not permissible.)
- On page 2, under the directions for use, delete the word "sample" from the use rate directions. (The word "sample" implies that the rates are advisory, not mandatory, and may lead people to overuse the product.)
- On page 2, replace the word "recommended" with "specified" in the directions underneath the use rates so the sentence reads, "Use the specified amount of moth balls..." (The word "recommended" implies that the rates are advisory, not mandatory, and may lead people to overuse the product.)

2 of 6

- On page 2, under the directions for use, replace the word "should" with "must" and add the following text so the second to last statement reads,  
"Paradichlorobenzene moth balls must not be mixed or placed in contact with Naphthalene moth balls or flakes, or other moth preventive products or chemicals."  
(The word "should" implies that this restriction is advisory, not mandatory.)

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself. This information can be added by non-notification per PR Notice 98-10.

A stamped copy of the label is enclosed for your records. The alternate brand name "Smart Living Moth Balls" has been added to our records. Please submit two copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact me by phone at: (703) 308-8735, or by email at: [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,



Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure

3076

**Front Panel:**

[Smart Living Moth Balls]  
[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	99.5%
Other Ingredients:	0.5%
TOTAL:	100.0%

[Net Wt. 10 oz (283.5g)]  
[Net Wt. 6 oz (171.2g)]  
[Net Wt. 5 oz (142.6g)]

ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
MAR - 8 2010  
Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, As amended; for the  
pesticide Registered under EPA Reg. No:

81433-2

[IMS Moth Balls] [Smart Living 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 Balls] [Smart Living Moth Balls] were specially developed to provide the excellent protection of moth balls without the strong smell and unwanted residue. [IMS Moth Balls] [Smart Living Moth Balls] 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 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.

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

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] [Smart Living 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] [Smart Living Moth Balls]. Replace when moth balls have dissipated.

[IMS Moth Balls] [Smart Living 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:**

[Sold by:]/[Distributed by:]  
[Name and address as appropriate]

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

**Back Panel:**

**Precautionary Statements**

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**

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

**Pesticide Disposal:** For unused product, call your local toxic waste agency for disposal instructions.

**Container Handling:** Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available.

Master Label for EPA Reg. No. 81433-2  
Alternative Language Enclosed in Brackets [ ]  
Revision: February 24, 2010

**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

Batch Number: \_\_\_\_\_