### 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 Cake

EPA Registration No. 81433-4

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, under the directions for use, replace the word "should" with "must" and add the following text so the last statement reads, "Paradichlorobenzene moth cakes must not be mixed or placed in contact with 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 is enclosed for your records. The alternate brand name "Smart Living Moth Cake" 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.

Sincerely,

Julie A. Chao

Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

Master Label Additional brand name and PR Notice 2007-4

Front Panel:

Revised February 24, 2010

[SMART LJVJNG MOTH CAKE]

[JMS MOTH CAKE]

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

In EPA Letter Dated:

☆ Kills moths & carpet beetles

☆ When used in air-tight containers each moth cake can treat up to 12 cu. ft.

☆ No clinging odor protects clothing

Left Back Panel:

## [\$MART LJVJNG] [JMS]

# MOTH CAKE

#### **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.

Remove cellophane wrapper. Thoroughly brush or clean articles before storing. Use one [IMS MOTH CAKE] [SMART LIVING MOTH CAKE] to every 12 cubic feet of tightly enclosed space. Place cake in plastic holder and hang in garment bag or over coat hanger. As chemical is used up replace with new unit. Pleasant odor quickly vanishes when articles are aired. DO NOT USE in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics. Paradichlorobenzene should not be mixed or placed in contact with other moth preventive chemicals.

#### 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.

4055

Master Label
Additional brand name and PR Notice 2007-4
Revised February 24, 2010

#### Right Back Panel:

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	Take off contaminated clothing.	
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.

#### NOTICE:

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

EPA Reg. No. 81433-4	
EPA Est. 81217-CHN-001	
Batch Number:	

Master Label Additional brand name and PR Notice 2007-4 Revised February 24, 2010

Made in China

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

Manufactured by: IMS Trading, L.L.C. Los Angeles, CA

#### Bottom Left Panel:

#### KEEP OUT OF REACH OF CHILDREN

WARNING: See back panel for additional precautions.

NET CONTENTS 6 oz. Three (3) cakes (170.10g)

#### Bottom Right Panel:

#### INGREDIENT STATEMENT

Active Ingredient: Paradichlorobenzene	99.8%
Inert Ingredients:	0.2%
Total:	