

81433-5

3/8/2010

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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 Crystals
EPA Registration No. 81433-5
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 2, under the directions for use, replace the word "should" with "must" and add the following text so the last statement reads, "Paradichlorobenzene moth crystals 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.)
- On page 2, the last two statements (restriction against mixing with other moth preventive products and restriction against storing in plastic containers) under the directions for use must be presented as a separate paragraph, rather than under the Rugs and Carpets section, as these statements are applicable to all uses of the product, not just rugs and carpets.

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 Crystals" 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,



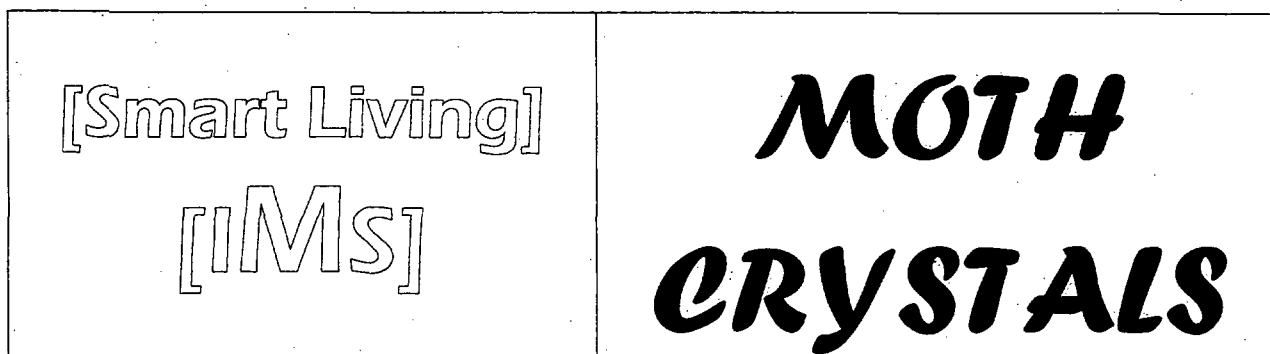
Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

Master label
Revised February 24, 2010
Additional brand name and PR Notice 2007-4
[Alternate language in brackets]

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Right Panel:



- ☆ Kills clothes moths, eggs & larvae
- ☆ No clinging odor. Protects clothing
- ☆ When used in air-tight containers this product can treat up to 100 cu. ft.

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:

81433-5

**KEEP OUT OF REACH
OF CHILDREN**

WARNING: SEE SIDE AND
BACK PANEL FOR ADDITIONAL
PRECAUTIONS.

INGREDIENT STATEMENT

Active Ingredient: Paradichlorobenzene.....99.8%
Inert Ingredients:.....0.2%
TOTAL:.....100%

[Sold by:]/[Distributed by:]

[Name and address as appropriate]

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

NET WT. 1 lb. (453.6g)

Left Panel:

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.

[IMS Moth Crystals] [Smart Living Moth Crystals] are harmless to even the most delicate fabric. Use the rate of 1 lb. for each 100 cubic ft. of contained spaces. Articles to be stored should be cleaned or thoroughly brushed.

Master label
 Revised February 24, 2010
 Additional brand name and PR Notice 2007-4
 [Alternate language in brackets]

FOR CLOTHING, BLANKETS, DRAPERIES, FURS, ETC., sprinkle [IMS Moth Crystals] [Smart Living Moth Crystals] freely on bottom of storage space, between folds and layers of articles and an extra amount on top before closing container. Excellent for use in garment bags. Be sure storage space is tightly sealed.

RUGS AND CARPETS are effectively protected from moths and carpet beetles when [IMS Moth Crystals] [Smart Living Moth Crystals] are freely sprinkled between folds, rolled and wrapped in heavy paper. Seal tightly to contain vapors. Paradichlorobenzene should not be mixed or placed in contact with other moth preventative chemicals. Do not use in plastic storage boxes.

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	<ul style="list-style-type: none"> • 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	<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 further treatment advice.
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.
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 reuse empty box or cellophane. Offer for recycle 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. 81433-5
 EPA Est. 81217-CHN-001

MADE IN CHINA

Batch Number: _____