

81433-6

3/8/2010

1 of 5

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 Original Moth Balls
EPA Registration No. 81433-6
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:

- Add the word "Original" to the proposed alternate brand name so it reads, "Smart Living Original Moth Balls." (The proposed name "Smart Living Moth Balls" is the same as another registered product.)
- On page 2, under the directions for use, replace the word "should" with "must" and add the following text so the third sentence in the fourth paragraph reads, "Naphthalene moth balls must not be mixed or placed in contact with paradichlorobenzene moth balls or flakes, or other moth preventive products or chemicals." (The word "should" implies that this restriction is advisory, not mandatory.)
- On page 3, replace the word "recommended" with "specified" in the directions underneath the use rates so the sentence reads, "To ensure protection, use the specified amount of product..." (The word "recommended" implies that the rates are advisory, not mandatory, and may lead people to overuse the product.)

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 Original 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.

Sincerely,



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

Enclosure

305

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

[SMART LIVING MOTH BALLS] IMS ORIGINAL MOTH BALLS

- > **Kills Clothes Moths**
- > **Kills Moths, Eggs, and Larvae in Storage Closets, Trunks, Chests, Garment Bags, and Air Tight Containers**
- > **Protects in Winter and Summer**

Active Ingredients:

Naphthalene	99.95%
Inert Ingredients	0.05%
Total	100.00%

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:

81433-6

KEEP OUT OF REACH OF CHILDREN

WARNING

**SEE BACK (SIDE) PANEL(s) FOR PRECAUTIONARY
 STATEMENTS AND FIRST AID**

Net Contents: ____ oz.

EPA Reg. No. 81433-6

EPA Est. No. 81433-XXX-XXX

PRECAUTIONARY STATEMENTS:

HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if inhaled. Do not breathe vapors. Avoid contact with skin, eyes, or clothing. Remove contaminated clothing and wash before reuse. Harmful if swallowed. Wash thoroughly with soap and water after handling.

Keep Out of Reach of Children. Do not place in areas accessible to children.

FIRST AID

If swallowed	Call poison control center or doctor immediately for treatment advice. Have person drink several glasses of water. Do not induce vomiting. Do not give anything by mouth to an unconscious person.
If in eyes	Hold eyes open and rinse with water for 15-20 minutes Remove contact lenses after 5 minutes and continue rinsing eyes. Call a poison control center or doctor for treatment advice.
If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If inhaled	Move person to fresh air.

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If a person is not breathing, call 911 or an ambulance, then give mouth-to-mouth respiration.

Call a poison control center or doctor for treatment advice.

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

Storage and Disposal

Pesticide Storage: Store in original container in a dry place not accessible 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 this container. Offer for recycling, if available.

DIRECTIONS FOR USE

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

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

[**IMPORTANT:** It is illegal to sell sachets individually. Do not open sachets.] - This statement will be placed on the label when the product is sold in sachets or no later than September 30, 2013.

Kills clothes moths and their larvae and eggs in storage closets, trunks, chests, garment bags, and containers (air tight). Do not use dry cleaning bags or containers which will allow vapors to escape into occupied rooms. Naphthalene moth balls should not be mixed or placed in contact with paradichlorobenzene moth products. For use only on clothes containing wool or wool blends.

Before storing clothes, have them dry cleaned, wash or brush articles to be protected and stored. Apply at a rate of one ounce of moth balls per three cubic feet.

Apply product in air tight containers, bags, and closets at the following rates:

<u>Ounces of Product</u>	<u>Volume of Enclosed Space</u>
4	Average garment bag (12 cu. ft.)
[5	Large trunk (15 cu. ft.)]
[6	(18 cu. ft.)]
[10	(30 cu. ft.)]
[12	(36 cu. ft.)]
14	Small closet (42 cu. ft.)
[24	(72 cu. ft.)]

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For other spaces, volumes can be calculated by measuring and multiplying the height, width, and depth of the area for treatment. To insure protection, use the recommended amount of product and maintain treatment for a minimum of seven days. To maintain protection over long term storage, replace moth balls that have dissipated.

Upon removing clothing from treatment, place in well ventilated area, odor will dissipate.

[Distributed by:]/[Sold by:]
Name and address of distributor

Manufactured by:
IMS
Los Angeles, CA 90036
[Made in China]