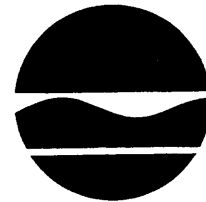


LAVANDIN OIL

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
50 Wolf Road, Albany, New York 12233-7250
Phone: 518-457-6934 Fax: 518-457-0629



John P. Cahill
Acting Commissioner

JAN 06 1997

Certified Mail
Return Receipt Requested

Mr. James H. Wallace, Jr.
Registration Specialist
S.C. Johnson & Son, Inc
1525 Howe Street
Racine, WI 53403-2236

Dear Mr. Wallace:

Re: Application to Register OFF! Moth Proofer (EPA Reg. No. 4822-440)

The New York State Department of Environmental Conservation has completed review of the referenced pesticide registration application, received September 10, 1996 and hereby registers the product for general sale and use in New York State.

OFF! Moth Proofer is intended for use as a moth repellent in clothing storage areas. The product is contained in a plastic package with a semi-permeable membrane on one side which controls release of the active ingredient into the storage area.

The active ingredient, lavandin oil, is found in nature. It is classified by FDA as "generally regarded as safe" and approved for use as a food and cosmetic additive. The U.S. Environmental Protection Agency (EPA) has classified lavandin oil as a bio-pesticide and, therefore, has required only a limited number of studies for registration.

The application was determined to be complete and a letter of completeness was sent to S.C. Johnson on November 25, 1996.

We have concluded that lavandin oil is not highly toxic to laboratory animals on an acute basis by the oral and dermal exposure routes, is non-irritating to human and animal skin and non-sensitizing to humans. The formulated product is moderately irritating to animal eyes. The EPA did not require acute inhalation studies.

Mr. James H. Wallace, Jr.

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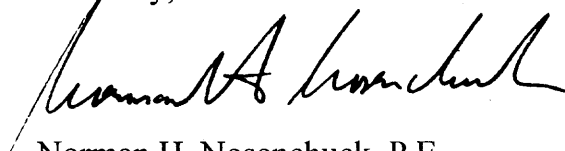
The information provided by S.C. Johnson to support registration of OFF! Moth Proofer was quite limited. Some calculations of exposure of humans to lavandin oil from food sources and from inhalation provided by the registrant were either based on values not supported by the information provided or are were calculated incorrectly by the registrant. Also, some of the tests submitted did not provide adequate detail on how the studies were conducted and could not be relied on by themselves. However, despite this, we were able to conduct an adequate review using existing information. Based on the available toxicity data and the expected exposure of the general public to lavandin oil from use of this product, we have determined that registration is warranted.

We have also concluded that labeled uses of OFF! Moth Proofer are such that they would preclude the possibility of impacts to groundwater, surface water and the fish and wildlife.

Enclosed, are a copy of the acceptable label and the Certificate of Registration showing the product as registered.

Please call Mr. Frank Hegener of my staff, at (518)457-7446, if you have any questions regarding the above.

Sincerely,



Norman H. Nosenchuck, P.E.

Director

Division of Solid & Hazardous Materials

Enclosures