

## EFFICACY STUDY REVIEW

by Kevin J. Sweeney, Entomologist - IB

To: Richard Gebken

Date: January 6, 1999

EPA Reg. No. or File Symbol: 64240-2

Product Name: Combat Roach Control System

Registrant: Clorox

PM: Marion Johnson, Jr.

Action: 385

Submission No. S550601 DP 250585

Chemical: hydramethylnon Type: (I)

Studies Submitted: to support the addition of American cockroach claims for faster kill

**MRID: 446589-01**

**Clorox formula F1998.0105 - Speed of Kill - American Cockroach**

There is one label for large roaches and one for small roaches. The submission put small roach claims on the right and large roach claims on the left.

The submitted is acceptable to support the label claims of "Improved Control" and "Faster Control" for American (large) cockroaches only.

The additional label claim for German (small) cockroaches "Keeps roaches away for 3 months" is **unacceptable** and **cannot** be on the label. This statement implies repellency. The company response to my inquiry about this claim implied that it referred to "kill". The label already addresses German cockroach kill for 3 months.