

64240-33

1/15/2008

1099



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 15 2008

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Bob Brennis, Agent for Combat Insect Control Systems
Lewis & Harrison
122 C Street, N.W. Suite 740
Washington, DC 20001

Dear Mr. Brennis:

Subject: Combat® Small Roach Bait F.03
EPA Reg. No. 64240-33
Submission dated Oct 15, 2007

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Delete the guarantee or delete the conditions associated with the guarantee. As presently drafted, the label disclaims the guarantee, the directions for use and the label claims.

Delete from the directions for use the text "for best results" as it detracts from the directions for use.

Delete the heightened efficacy claim "maximum roach control."

Delete the following comparative claims:

- With foods roaches prefer
- No vapor, fumes, odor or mess

Qualify the claim "doesn't stop working for 1-6 months" to read "up to 1-6 months"

Clarify what the footnote "[Applies to claims of greater than 3 months]" refers to since the footnoted claims say up to 1-6 months.

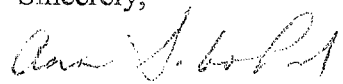
Delete the following statements, as it is not clear to what size package they apply, and they may detract from the Net Contents and may require child resistant packaging review:

Bonus Pack (applies to packs to which more baits are added)
50% more free (applies to packs to which 50% more baits are added)
6 bonus baits with purchase (applies to packs to which 6 more baits are added).

Delete or clarify the reference to "normal" infestation.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



for

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

30f9

Note: **Bold, Italicized text is information for the reader and is not part of the label.**
[Bracketed information is optional text.]
Underlined text is new.

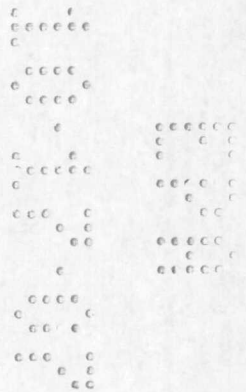
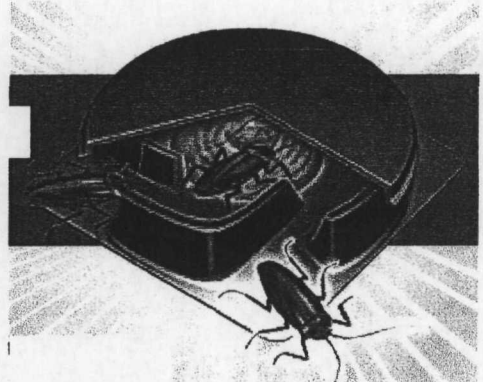
Master Label, October 2007
EPA Reg. No. 64240-33
Combat Small Roach Bait F.03
Pg 1 of 7

COMBAT[®] Small Roach Bait F.03

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 15 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
64240-33



For Small Roaches
Overnight [Action] Formula
Kills Overnight & Keeps on Killing for up to 6 Months[*]

[ROACH]

ACTIVE INGREDIENTS: Fipronil†.....0.03%
OTHER INGREDIENTS:99.97%
† CAS No. 120068-37-3

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.
CAUTION:
See precautionary statements on back *-or-* side panel.

EPA Reg. No. 64240-33
EPA Est. No. 071106-GA-001
Distributed by & ©2007 Combat Insect Control Systems
[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

[Combat GUARANTEED to work [OR YOUR MONEY BACK]]

[CONTAINS] 6 *-or-* 12 *-or-* 18 *-or-* 30
Child-resistant bait stations [for small roaches]

[TOTAL] NET WT. [0.21 oz. (6g)] [0.42 oz. (12g)] [0.63 oz. (18g)] [1.06 oz (30g)]

[U.S. Patent Nos. _____ and others pending.]

[] [[The paperboard in this] [C]carton [contains] [is made from] _____% Recycled fiber [minimum
_____ % post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Wash [hands] thoroughly with soap and water after handling bait stations.

STORAGE AND DISPOSAL: [Do not contaminate water, food or feed by storage or disposal.]

STORAGE: Store in cool, dry area out of reach of children.

DISPOSAL: If empty: Do not reuse this container. Place in trash [or offer for recycling if available]. If partly filled: Call your local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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DIRECTIONS FOR USE

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

GENERAL INFORMATION

[THIS IS] [HOW] [THIS] [Combat] PRODUCT WORKS:

1. Roaches enter the bait station and eat the bait.
2. Roaches return to their nest and die.
3. Other roaches eat them and die, creating a chain reaction.

-or-

1. Roaches enter the bait station and eat ***-or-*** feed on the bait.
2. Roaches take the bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.



- Laboratory and home use tests prove Combat® provides up to 1-6 months[*] of effective roach control
- Easy to use – nothing to activate
- No vapor, fumes, odor [or] [mess]

[EFFECTIVENESS GUARANTEED: COMBAT® Insect Control Systems stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding COMBAT® baits, please call 1-800-426-6228.]

* The success of this product to kill/control small cockroaches can be affected by cockroach population size, sanitary conditions and the extent to which other residents apply cockroach control methods.

-or-

* Results may be affected by the number of roaches, the cleanliness of the area, and the use of other roach control measures throughout the structure.

For information, call the Combat® [Labs] [Information] Helpline at 1-800-426-6228. ***-or-*** For questions or comments, please call the Combat® Labs [Information] Helpline at 1-800-426-6228 [for information].

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DIRECTIONS FOR USE, continued

MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 6 -or- 12 -or- 18 bait stations at one time.] [Replace bait stations every 3 -or- 6 months[*]].

Kitchen:

Under/around sink
Under refrigerator
Under stove

On counters
In cupboards/drawers
Near garbage cans

Near doors
On floor/in corners

Bathroom:

Behind toilet
Under/around sink

Near shower/bathtub
Inside cabinets/drawers

On flower/in corners

-or-

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations. -or- The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room). -or- Normal infestation requires 6 -or- 12 -or- 18 bait stations.

[*Applies to claims of greater than 3 months.]

DATE PLACED (Month/Year)	LOCATION	REPLACEMENT DATE (After 3 -or- 6[*] Months)

This product is specifically designed for small roaches.

Small, 1/2" Cockroach

Habits: Primarily live and breed in moist areas like kitchens and bathrooms. For effective control, bait stations should be placed wherever roaches have been seen in your home.

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DIRECTIONS FOR USE, continued

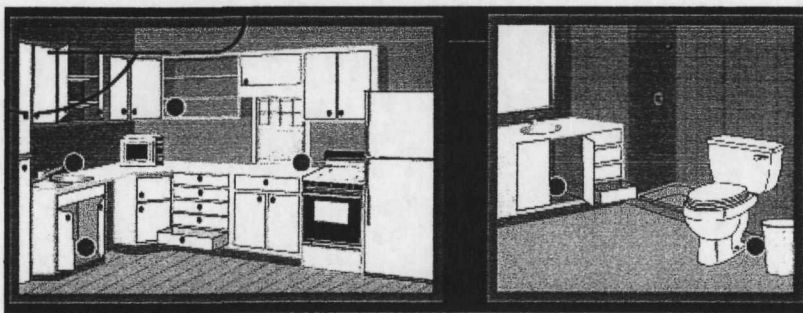
GENERAL RESTRICTIONS

Do not remove or puncture label on bait stations.

APPLICATION INSTRUCTIONS

1. [Remove wrapper.] [For best results] [U]use all 6 -or- 12 -or- 18 baits [at one time]. Break baits apart. Do not remove or puncture [the] label[s] on bait station[s]. [Now the baits are ready to use.]
- 2.[1.] Place baits wherever you see or have seen roaches **-or-** signs of roaches **-or-** where roaches are found. Then place additional baits about 1 ½ feet away. [Put any remaining baits as **-or-** Some of the most likely locations **-or-** [roach] hiding places for roaches are shown in the diagram[s] to the right **-or-** left **-or-** above **-or-** below. [TIP: For best results, place baits about 1 ½ feet away from each other.]
3. Put out all 6 -or- 12 -or- 18 baits. If you have fewer than 6 -or- 12 -or- 18 places where you have seen roaches, place the extra baits about 1 ½ feet away from the other baits that you have just placed. Roaches find the bait faster when all bait stations **-or-** baits are placed out.
- 4.[2.] Place baits properly so that they are touching walls or corners. [TIP: Place properly. Bait stations **-or-** Baits work best on horizontal surfaces when touching walls or corners. Only use enclosed stickers [as needed] when placing baits on walls or upside down. It is not necessary to use stickers on all baits.]
- 5.[3.] Replace all baits every 3 **-or-** 6 months[*], or sooner if roaches return [because roaches have probably eaten all of the bait inside]. [Need to replace baits since the roaches have probably eaten all the bait inside.]

[TIP:] [Do not use sprays or foggers around bait stations.] [They can contaminate bait stations and reduce effectiveness.] [Use enclosed stickers for vertical surfaces.]



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Claims for front or back

- Kills [for] up to 1-6 months[*]
 - Kills roaches quickly
 - Kills [roaches] in hours
 - Quick kill formula
 - Kills roaches where they hide ***-or-*** breed ***-or-*** live ***-or-*** at the source
 - Non-stop roach control for up to 6 months[*]
 - Satisfaction ***-or-*** Quality Guaranteed
 - Kills roaches you see and [even] those you don't
 - Protects ***-or-*** Defends your home against roaches
 - Guaranteed to work or your money back
 - Child resistant bait stations
 - Continuous roach control for up to 1-6 months[*]
 - Kills non-stop for up to 1-6 months[*]
 - Kills roaches and keeps on killing for up to 1-6 months[*]
 - Provides maximum roach control for up to 1-6 months[*]
 - Works within hours and for up to 1-6 months[*]
 - Starts working ***-or-*** killing in hours, doesn't stop working for 1-6 months[*]
 - Keeps killing for up to 1-6 months[*]
 - Better bait formula [for improved control]**
 - Increased feeding [for improved control]**
 - With foods roaches prefer
 - With [a blend of] [multiple] foods roaches eat
 - With multiple foods to kill roaches [and the nest]
- [Bonus Pack] (***applies to packs to which more baits are added***)
 - [50% More Free] (***applies to packs to which 50% more baits are added***)
 - [6 Bonus Baits With Purchase] (***applies to packs to which 6 more baits are added***)

*[Applies to claims of greater than 3 months]

** vs. previous formula

9049

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UNIT LABEL

COMBAT[®] Small Roach Bait F.03

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENTS: Fipronil†.....0.03%
OTHER INGREDIENTS:99.97%
† CAS No. 120068-37-3

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION:

Wash [hands] thoroughly with soap and water after handling bait stations.

DISPOSAL: If empty: Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For questions, comments or information about COMBAT, call toll free 1-800-426-6228.]
[Questions or Comments? Call 1-800-426-6228.]

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SEE OUTER CARTON – or - BAG FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT [0.035 oz (1g)] **-or-** [0.05 oz (1.4g)]