Mr. William Metzger American Cyanamid Company Shulton Research Division 697 Route 46 Clifton, NJ 07015

Dear Mr. Metzger:

Subject: Amendment - Administrative Label Changes Combat Roach Control System EPA Registration No. 1730-66 Your Application Dated December 17, 1985

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

- 1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - Delete the statement beginning, "Note: Pets may encounter a Combat bait tray. The bait "
- 3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

In our October 4, 1985 letter we agreed to the administrative label changes per Robert Linkfield's letter of June 19, 1985. These changes involved only items 1 General, and 2 Directions, of your June 12, 1985 submission. Item 3 of same letter is presently under review.

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EPA Form 1320-1 (4-81)

OFFICIAL FILE COPY

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

George T. LaRocca Product Hanager (15) Insecticide-Rodenticide Branch Registration Division (TS-767C)

Fnclosure



12/17/85

LARGE TRAYS CARTON FRONT PANEL

ACCEPTED

WITH COMMENTS

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FEB 1 0 1999

New COMBAT[©] Roach Control System
For Large Roaches, water bugs and palmetto bugs
Guaranteed to work or money back (SEE BACK PANEL)
Contains 8 Childproof Bait Trays
Kills Roaches for three months

Fader to 1730-66

Total Net Wt. 2.11 oz.

KEEP OUT OF REACH OF CHILDREN

CAUTION: (See Directions and Cautions on Back)

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12/17/85

LARGE TRAYS CARTON BACK PANEL

COMBAT® Roach Control System

COMBAT® bait trays contain a totally unique insecticide ingredient to kill roaches. Laboratory and home use tests prove COMBAT gives more long lasting control than the insecticides in leading sprays and foggers. This product is specially designed for large roaches, water bugs, and palmetto bugs. Make sure to select the right COMBAT Roach Control System for your roach problem by using the pictures below to identify which type of cockroach pest you have. If you have seen both types of cockroaches in your home it is strongly suggested you purchase both sizes of COMBAT Roach Control Systems for effective roach control.

Tray Diagram
Roaches enter
Eat the bait
Crawl away to die

Large American Cockroach
Large Habits: Primarily live
roach and breed outdoors and
photo and enter homes in
search of food. Tray
placement near potential
points of entry is key.

German roach photo Small German Cockroach Habits: Primarily live and breed in moist areas like kitchens and bathrooms. More trays are required for effective control.

Directions for Use:

It is violation of Federal Law to use this product in a manner inconsistent with its labeling. For effective roach control, you must use all 8 trays at once: Placement Diagrams

- 1. Place all 8 bait trays in areas where you have actually seen roaches. For example, near or in floor drains and other exposed plumbing fixtures, near basement windows and doors, and where food is prepared and stored.
- Use the entire contents of this carton at once. For best results, place'
 next to walls and flush in corners, and at a coverage rate of 2 to 3 per
 100 sq. ft.
- 3. If applying COMBAT® to vertical surfaces use enclosed stickers by removing paper backing from both sides. Stickers are not needed on all trays.
- 4. Roaches will begin eating the bait immediately and you should expect to see fewer roaches within two weeks.
- 5. Replace all trays every 3 months for effective control of large roaches. Be sure to use the 3 month replacement reminder enclosed.



12/17/85

LARGE TRAYS CARTON BACK PANEL (CONTINUED)

Note: Pets may encounter a COMBAT® bait tray. The bait contained in the COMBAT tray will not cause harm to pets if ingested.

PRECAUTIONARY STATEMENTS:

CAUTION: HAZARDS TO HUMANS. May be harmful if swallowed. FIRST AID: if swallowed, drink two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention. In case of emergency, call collect, 201-835-3100. DISPOSAL: Wrap containers and put in trash can. EFFECTIVENESS GUARANTEE: If COMBAT does not provide roach control, return all 8 bait trays for full refund to Consumer Affairs Department, American Cyanamid Company, Wayne, New Jersey 07470.

If you have any questions or comments about COMBAT, please call us toll free 1-800-4 COMBAT (Monday through Friday, $9:00\,$ AM to $4:00\,$ PM Eastern Time.

CYANAMID American Cyanamid Company Household Products Wayne, NJ 07470

EPA Reg. No. 1730-66 EPA Est. No. 1730-MS-01 One or more of the following U.S. Patents: Patent No. 4,163,102, No. Re 29,358, No. 4,353,907, No. 4,087,525, No. 4,213,988, and other patents pending.



12/17/85

LARGE TRAYS INSERT FRONT PANEL

3 MONTH REMINDER
Replace all COMBAT® bait trays 3 months after placement.

Peel off label and place in a convenient location. Suggested locations: on your calendar, on top of one of the visible COMBAT® bait trays, on your refrigerator, inside the kitchen cabinet door, etc.

Time to Replace COMBAT©
Date ______ (3 months after placement)

American Cyanamid Company Household Products Wayne, NJ 07470



12/17/85

LARGE TRAYS Bait Tray Label

Note: Pets may encounter a COMBAT bait tray. The bait contained in the COMBAT tray will not cause harm to pets if ingested. DISPOSAL: Wrap containers and put in trash can. For questions or comments about COMBAT, call toll free 1-800-4 COMBAT (Monday through Friday, 9:00 AM to 4:00 PM Eastern time).

Net Wt. 0.264 oz. (7.5g) American Cyanamid Company Household Products Wayne, New Jersey 07470

EPA Reg. No. 1730-66 EPA Est. No. 17. 1-MS-01

KEEP OUT COMPLETE DIRECTIONS.



12/17/85

SMALL TRAYS CARTON FRONT PANEL

CAUTION: See Directions and Cautions on Back

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ACCEPTED with COMMENTS to EPA Letter Dated:

FEB 1 0 1986

Under the Federal Insecticide, Functicide, and Rodenticide Act as amended, for the pesticide registered under EPA Peris, No. 1730-66

ACCEPTED
with COMMENTS
in EPA Letter Dated:



FEB 1 0 1986

AMERICAN CYANAMID COMPANY EPA REG. NO. 1730-66

Under the Federal Insecticide, Fungicide, and Research 12/17/85 as amended, for the port 2/17/85 registered under EPA Reg. No. 1730 66

SMALL TRAYS CARTON BACK PANEL

COMBAT Roach Control System

COMBATE bait trays contain a totally unique insecticide ingredient to kill roaches. Laboratory and home use tests prove COMBAT gives more long lasting control than the insecticides in leading sprays and foggers. COMBAT can be placed next to food, in cabinets, anywhere you've seen roaches, even where you wouldn't dare spray.

HERE'S HOW COMBAT WORKS (diagram)

Roaches enter eat the bait crawl away to die

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For effective roach control, you must use a minimum of 12 trays at once and replace all trays every 3 months.

- 1. Break COMBAT bait trays apart from the plastic frame.
- 2. Place all 12 trays in areas where you've seen reaches (see illustration). For 8 feet by 12 feet or smaller kitchens, use at least 10 trays in the kitchen and 2 in each bathroom. For more than one bathroom, you should use additional trays and place at least 10 in the kitchen and 2 in each bathroom. For larger kitchens or particularly heavy infestations, we strongly recommend using additional trays and placing at least 12 trays in the kitchen and 2 in each bathroom. If you discover roaches in other areas, such as the bedroom or utility room, you will need to obtain additional trays. For best results, place COMBAT next to walls and flush in corners.
- 3. If applying COMBAT on vertical surfaces, use enclosed stickers by removing paper backing from both sides. Stickers are not needed for all 12 trays.
- 4. Roaches will begin eating the bait immediately and you should expect to see fewer roaches within a week.
- 5. Replace all trays every 3 months to keep roaches from reappearing. Be sure to use 3-month replacement reminder (enclosed).

(Placement diagram)

Note: Pets may encounter a COMBAT bait tray. The bait contained in the COMBAT tray will not cause harm to pets if ingested.

PRECAUTIONARY STATEMENTS:

CAUTION: HAZARDS TO HUMANS. May be harmful if swallowed.
FIRST AID: If swallowed, drink two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconcious person. Get medical attention. In case of emergency, call collect, 201-835-3100.

DISPOSAL: Wrap containers and put in trash can.

EFFECTIVENESS GUARANTEE: If COMBAT does not provide roach control, return all 12 bait trays for a full refund to: Consumer Affairs, American Cyanamid Company, Wayne, New Jersey 07470.



12/17/85

SMALL TRAYS CARTON BACK PANEL (CONTINUED)

If you have any questions or comments about COMBAT, please call us toll free 1-800-4 COMBAT (Monday through Friday, 9:00AM to 4:00PM Eastern Time).

CYANAMID American Cyanamid Company Household Products Wayne, NJ 07470

EPA Reg. No. 1730-66 EPA Est. No. 1736-MA-01 One or more of the following U.S. Patents: Patent No. 4,163,102, No. Re 29,358, No. 4,353,907, No. 4,087,525, No. 4,213,988, and other patents pending.

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ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 1 0 1986

Under the Constitute, Serticide, the Act as amounted and the registered under LPA Reg. No.



12/17/85

SMALL TRAYS BAIT TRAY LABEL

Note: Pets may encounter a COMBAT bait tray. The bait contained in the COMBAT tray will not cause harm to pets if ingested. DISPOSAL: Wrap containers and put in trash can. For questions or comments about COMBAT, call toll free 1-800-4 COMBAT (Monday through Friday, 9:00 AM to 4:00 PM Eastern time).

Net Wt. 0.053 oz. (1.5g) American Cyrnamid Company Household Products Wayne, New Jersey 07470 EPA Reg. No. 1730-66 EPA Est. No. 1730-MA-01

KEEP OUT OF REACH OF CHILDREN

ACCEPTED
with COMMENTS
in EPA Letter Dated:

FEB 1 0 1996

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