

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 26 1992

Mr. William McCormick
Product Safety & Regulatory Compliance
The Chlorox Company
P.O. Box 493
Pleasanton, CA 94566-0803

Dear Mr. McCormick:

Subject: Amendment - Revised Labeling
COMBAT Roach Killing System
EPA Registration No.: 64240-2
Your Submission Dated April 20, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. Delete the claim "Combat gives longer lasting roach control than leading sprays and foggers." A similar claim was previously rejected in our letter of January 22, 1991 (i.e., item no. 15 listed in proposed claims of May 25, 1990 for Combat Roach Control System: "Killing power lasts longer than a single spraying and/or fogging.")
2. Change "Directions" to "Directions for Use," which is the required heading.

The new product name "Combat Roach Killing System" is acceptable and has been made a part of the record for this product.

Submit five copies of your final printed labeling before you release the product for shipment.

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

Sincerely,

BEST AVAILABLE COPY

George T. LaRocca
Product Manager (13)

CONCURRENCE
Insecticide-Rodenticide Branch
Registration Division (H7505C)

SYMBOL	PM						
SURNAME	Enclosure						
DATE	5/7/92						

NEW! **NEW!** **IMPROVED**
ROACH KILLING FORMULA!
 SEE BACK PANEL FOR DETAILS

COMBAT

COMBAT®

ROACH KILLING SYSTEM

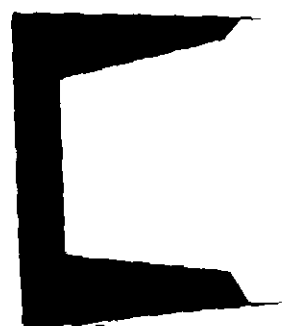
ROACH KILLING SYSTEM
 KILLS ROACHES FOR 3 MONTHS

CONTAINS 12 CHILD-RESISTANT BAIT DISCS

ACTIVE INGREDIENTS: Hydromethylnon (tetrahydro-5,5-dimethyl-2H-pyrimidinone) 3.34 (11-Fluoromethylphenyl 1,1,1-trichloro-2-methyl-2-phenylethyl) 2-propenylidenethydrate 0.66
 OTHER INGREDIENTS



CAUTION: DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT DISCS



EPA Reg. No. 64270-2
 EPA Est. No. 5813 MS-01
 U.S. Patent Nos. 4,163,102 RE 29,358 & 3,531,907 & 4,047,525 & 2,113,988 DTS 270
 842 & 563,836 and other patents pending.
 07034 2



Carton Made From 100% Recycled Paperboard
 Minimum 35% Post-Consumer Content

© 1991 Distributed by
 Combat Insect Control Systems
 1221 Broadway
 Oakland, CA 94612
 MADE IN U.S.A.

ACCEPTED FOR COMMENTARY
 by EPA Label Division
 MAY 26 1992
 order the Federal Insecticide, Fungicide, and Rodenticide Act
 registered, for the products
 listed under EPA Reg. No.
 64270-2

41294 41910

COMBAT

ROACH KILLING SYSTEM

- THREE MONTHS OF EFFECTIVE CONTROL
- EASY TO USE - NOTHING TO ACTIVATE
- NO VAPOR OR FUMES
- CHILD-RESISTANT

THIS IS HOW THE COMBAT ROACH KILLING SYSTEM WORKS

- 1 ROACHES enter disc.
- 2 ROACHES leave disc after eating bait inside.
- 3 Behind your walls, ROACHES share bait with more roaches who also die.



Combat Roach Killing System contains a totally unique insecticide ingredient that even kills roaches resistant to common insecticides made with pyrethroids, organophosphates, and carbamates. Laboratory and home use tests prove Combat gives longer lasting roach control than leading sprays and foggers.

EFFECTIVENESS GUARANTEE: COMBAT® stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding COMBAT®, please call 1-800-426-6228.

DIRECTIONS

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

1. Break COMBAT® discs apart from plastic frame. Use all 12 discs at the same time for thorough control.
2. Place discs wherever roaches are seen, at least 10 discs in the kitchen and 2 in each bathroom (under refrigerator and appliances, inside cabinets and drawers). Refer to diagram for specific placement locations. Do not use sprays or foggers around baits: they can contaminate discs and reduce effectiveness.
3. Baits work best on horizontal surfaces touching corners and walls. Use enclosed stickers for vertical surfaces.
4. Replace all discs after 3 months of use, sooner if infestation is heavy. Use enclosed replacement reminder.

DISPOSAL: Wrap used discs and put in trash.

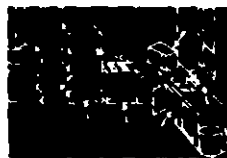
MOST IMPORTANT LOCATIONS

Normal infestation requires 1 box (12 discs).

Heavy infestation may require 2 boxes (24 discs).

Additional locations:

Bedroom, Living room
Attic, Garage & Laundry Room.



KITCHEN



BATHROOM

BEST AVAILABLE COPY

