

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 13 1995

3451305-15478675 +5467848
3451305-18

Mr. William C. McCormick
Maxforce Insect Control Systems
7200 Johnson Drive
Pleasanton, CA 94588

Dear Mr. McCormick:

Subject: Amendment - Label & Confidential Statement of Formula
(CSF)
Combat Roach Killing System
EPA Registration No. 64240-2
Your Submissions dated May 3, & September 19, 1994

The amendment 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.

1. The efficacy data is adequate to support the claims submitted with your May 3, 1994 submission with respect to German cockroach and similar small roaches. They are not acceptable at this time for large cockroaches. See the attached Efficacy review for acceptable claims for large roaches. In addition the following claims are not acceptable, since they imply total eradication or/are a false/misleading comparison to other products.

....."Eliminates roaches and eggs". "Kills roaches and their eggs without vapor and fumes". "Longer lasting control than leading sprays and foggers". "Unique insecticide".

2. Delete "Kills roaches for 3 months". Although we approved this claim for smaller roaches no data/information was submitted to support claims for larger roaches.

3. The claims preceded with the word "New" are allowed to be incorporated on new labeling produced for period not to exceed six months following approval.

4. In reference to the CSF dated 9/19/94 correct the upper and lower certified limits for hydramethylnon appearing in Columns

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

2 of 5

2

14(a) and 14(b) to read 2.1% and 1.9% respectively.

A stamped copy of the label and a copy of the Efficacy Review dated 1/30/95 are enclosed.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure:

2

A →

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 13 1995



Under the Federal Insecticide,
Fungicide, and Rodenticide Act
amended, for the pesticide
registered under EPA Reg. No.
64240-2

**ROACH
KILLING SYSTEM**

**FOR LARGE
ROACHES
WATERBUGS &
PALMETTO BUGS**

**FOR
LARGE
ROACHES,
WATERBUGS AND
PALMETTO BUGS**

B →

~~CONTAINS 8 CHILD-
RESISTANT BAIT DISCS
TOTAL NET WT 2.32 OZ~~



ACTIVE INGREDIENT Hydramethylnon (tetrahydro-5,5-dimethylpyrimidin-2-yl 1-[trifluoromethyl]phenyl) 1-[2,4-dimethylphenyl] ethan-1-yl 2-propanoylhydrazono-1-hydrazone

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

07035-200

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

EPA Reg. No. 64240-2
N.S. Product No. 471294-01
N.S. Product No. 471294-02
N.S. Product No. 471294-03
N.S. Product No. 471294-04
N.S. Product No. 471294-05
N.S. Product No. 471294-06
N.S. Product No. 471294-07
N.S. Product No. 471294-08
N.S. Product No. 471294-09
N.S. Product No. 471294-10
N.S. Product No. 471294-11
N.S. Product No. 471294-12
N.S. Product No. 471294-13
N.S. Product No. 471294-14
N.S. Product No. 471294-15
N.S. Product No. 471294-16
N.S. Product No. 471294-17
N.S. Product No. 471294-18
N.S. Product No. 471294-19
N.S. Product No. 471294-20



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

COMBAT® ROACH KILLING SYSTEM FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS



FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS

This product is specially designed for large roaches, waterbugs & palmetto bugs. Select the right COMBAT® Roach Killing System for your roach problem by using the pictures below to identify which type of pest you have.



Large, 1" to 1-1/2" Cockroach.
Habits: Primarily live and breed outdoors and enter homes in search of food. Disc placement near potential points of entry is key.



Small, 1/2" Cockroach.
Habits: Primarily live and breed in moist areas like kitchens and bathrooms. More discs are required for effective control.

If you have seen both types of cockroach in your home, it is strongly suggested that you purchase both sizes of COMBAT® Roach Killing System for effective roach control.

COMBAT® bait discs contain a totally unique insecticide ingredient to kill roaches. Laboratory and home use tests prove COMBAT® gives longer lasting control than leading sprays and foggers.

THIS IS HOW THE COMBAT® ROACH KILLING SYSTEM WORKS

ROACHES enter disc.

ROACHES leave disc after eating bait inside.

Behind your walls, ROACHES share bait with more roaches who also die.



- THREE MONTHS OF EFFECTIVE CONTROL - EASY TO USE-NOTHING TO ACTIVATE - NO VAPOR, FUMES OR ODOR

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 8 discs at the same time for thorough control.
2. Place discs wherever roaches are seen—near doors and windows (refer to diagram for other 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.

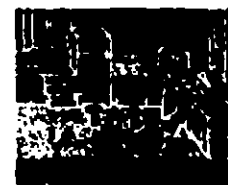
DISPOSAL: Wrap used discs and put in trash

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

OTHER LOCATIONS:

Kitchen, bathroom, other points of entry (garage, basement, attic, & outside doors).

Normal infestation requires 1 box (8 discs). Heavy infestation may require 2 boxes (16 discs).



BEST COPY AVAILABLE

- Even Kills roaches resistant to pyrethroids and organophosphates.
- New Improved Formula
- COMBAT's new formula offers greater roach control because it also kills roaches that are resistant to common insecticides made with pyrethroids, organophosphates and carbamates.
- New! Better Roach Control
- New! Improved Roach Control

BAIT TRAY LABEL

COMBAT® **ROACH KILLING SYSTEM**

BAIT DISCS

THIS SIDE DOWN: This side should be placed against surface.
(Note: Do not remove or puncture this label.)

ACTIVE INGREDIENT Hydramethylnon(tetrahydro-5, 5-dimethyl-2(1H)-pyrimidinone (3-[4-(trifluoromethyl)phenyl]-1-(2-[4-(trifluoromethyl)phenyl]ethenyl)-2-propenyl)ene)hydrazonone] 2.0%

INERT INGREDIENTS 98.0%

**CAUTION: DO NOT ALLOW CHILDREN OR PETS
TO PLAY WITH THE BAIT DISC.**

For questions or comments, please call the Combat ®
Roach Expert Hotline at 1-800-426-6228.

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1221 Broadway

Oakland, CA 94612

EPA Reg. No. 64240-2 EPA Est. No. 5813-MS-01

63465.002

NET WT. 0.0583 OZ. (1.65g)

SEE OUTER CARTON FOR COMPLETE DIRECTIONS.