

64240-2

11-22-2002

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0090, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number
SC0036

Application for Pesticide - Section I

1. Company/Product Number 64240-2	2. EPA Product Manager Marion Johnson	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Roach Killing System	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o PS&RC; P. O. Box 493 Pleasanton, CA 94566-0803 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION
NOV 22 2002

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification of non-mandatory labeling text. New additions are underlined and highlighted. Three copies of the label are enclosed.
98-10 Certification statement is attached.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Metal Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name J. Evelyn Lawson	Title Senior Information Scientist	Telephone No. (Include Area Code) (925) 425-6842
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Sally S. Christopher</i>	3. Title Regulatory Compliance Specialist	
4. Typed Name Sally S. Christopher	5. Date November 11, 2002	



(for accompanying OPP SC0036)
Combat® Roach Killing System
EPA Reg. No. 64240-2

Notification of non-mandatory labeling text addition per PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Sally S. Christopher
Signature of Official

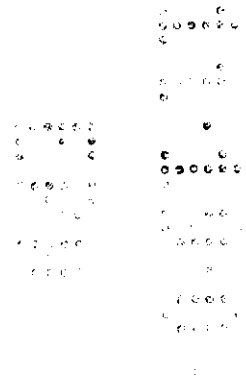
Sally S. Christopher
Regulatory Compliance Specialist

for:
Combat Insect Control Systems
c/o PS&RC
P.O. Box 493
Pleasanton, CA 94566-0803

NOTIFICATION
NOV 22 2002

November 11, 2002

P.O. Box 493
Pleasanton, California
94566-0803
925-425-6100
FAX 925-463-1187



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.

COMBAT.
ROACH KILLING SYSTEM

COMBAT.

ROACH KILLING SYSTEM



Combat, Roach or Prowest



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

CAUTION

See end -or- side -or- bottom -or- back panel for additional precautionary statements

ACTIVE INGREDIENT: Hydramethylnon† 2.0%
OTHER INGREDIENTS: 98.0%
TCAS No. 67485-29-4

EPA Reg. No. 64240-2
EPA Est. No. 5813-MS-01
U.S. Patent Nos. _____ and other patents pending.

[Kills] [For] Small Roaches

-or-

[Kills] [For] Large Roaches
Waterbugs & Palmetto Bugs

Distributed by & ©1997
COMBAT Insect Control Systems
1221 Broadway, Oakland, CA 94612
MADE IN U.S.A.

CONTAINS _____ CHILD-RESISTANT BAIT STATIONS

TOTAL NET WT _____

COMBAT.
ROACH KILLING SYSTEM

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID: If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. Combat [Information] Helpline: 1-800-426-6228.

R7361-13.1

NOTIFICATION
NOV 22 2002

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Note: **Bold, italicized text is information for the reader and is not part of the label.**
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COMBAT

ROACH KILLING SYSTEM

DIRECTIONS FOR USE:

GENERAL INFORMATION

Laboratory and home use tests prove COMBAT[®] provides 3 months of effective control (for small roaches).

Guaranteed to work
[or your money back!]

This product is specially designed for small roaches.

This product is specially designed for roaches -or- [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. Bait station 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 bait stations 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.



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

[THIS IS] [HOW] COMBAT[®] ROACH KILLING SYSTEM 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.

-OF-

[THIS IS] [HOW] COMBAT[®] WORKS:

- 1 Roaches enter [the] bait station and eat the bait.
- 2 Roaches take the bait back to the nest.
- 3 Roaches share the bait, killing other roaches and destroying the nest.



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

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.

claims for front or back:

for small roaches:

- Kills eggs and roaches at their source
- Prevents roach reproduction
- Prevents egg hatching
- [The Domino Effect™]
- As The Domino Effect™ spreads through the roach population, most roaches are killed, and still others lose their ability to produce eggs.
- This product's patented action formula kills roaches and eggs.
- This product provides complete roach control.]*
- This product disrupts the reproductive cycle of roaches.
- Kills roaches and eggs while you sleep.
- [Kill[s] roaches & eggs for 3 months.]*
- Kills roaches at their source

for large roaches:

- Kills roaches at their source
- Large bait kills large roaches
- Solves large roach problems

[* not for 6 count]

end of claims for front or back

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DIRECTIONS FOR USE CONTINUED:

GENERAL PRECAUTIONS AND RESTRICTIONS

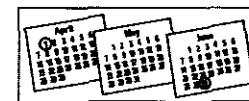
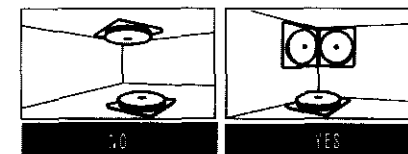
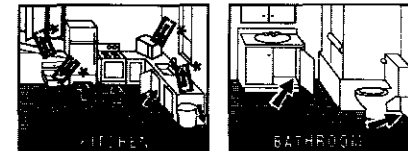
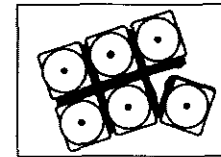
Do not remove or puncture label on bait stations.

APPLICATION INSTRUCTIONS

- [Remove wrapper.] Break COMBAT[®] bait[s] [stations] apart. For best results use all 8 -or- 12 -or- 18 bait stations at the same time for thorough control.
-or-
- Open pouch and separate the bait stations from plastic frame. Do not remove or puncture the label on bait station. [Now the baits are ready to use.]
- Place bait stations wherever you see or have seen roaches -or- Place bait stations wherever roaches are seen - near doors and windows at least 10 bait stations in the kitchen and 2 in each bathroom (under refrigerator and appliances, inside cabinets and drawers). [Refer to diagram for other placement locations.] [As shown in diagrams to the right -or- left.] Do not use sprays or foggers around -or- on -or- near baits; they can contaminate bait stations and reduce effectiveness.
- Baits work best on horizontal surfaces touching corners and walls. [Use enclosed suckers for vertical surfaces].
-or-
- Place at least 6 [or 10] bait stations in the kitchen and 1 [or 2] in each bathroom (food storage and water sources are the most common roach areas). Specific placement areas include under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.
- Place baits wherever you see [or have seen] roaches -or- signs of roaches; severe roach problems may require 2 boxes or more. [Then place additional baits about 1 1/2 feet away. The more bait stations placed out, the more roaches find the bait. This means faster and more effective control of your roach problem. Refer to diagram for placement locations.]
- [Place properly.] Bait stations work best when touching walls or corners. [Place baits properly so that they are touching walls and corners.] Use -or- Only use enclosed stickers when placing them upside down [or on walls]. Use enclosed stickers as needed. It is not necessary to use stickers on all baits.
- Replace all _____ bait stations every 3 months, or sooner if [infestation is heavy] [or] [roaches] [they] return, because roaches have probably eaten all of the bait [inside]. Use enclosed replacement reminder.

Directions for 6 count only:

- [Remove wrapper.] Break COMBAT[®] bait stations apart. Use all 6 bait stations at the same time.
- Place bait[s] [stations] wherever you see or have seen roaches -or- are seen. Do not use sprays or foggers around -or- on -or- near baits; they can contaminate bait stations and reduce effectiveness.
- Bait[s] [stations] work best [on horizontal surfaces] [when] touching corners and walls. [Place baits properly so that they are touching walls and corners.] [As shown in diagrams to the right -or- left.] Use enclosed stickers for vertical surfaces. [Only] Use enclosed stickers when placing them on walls [as needed]. It is not necessary to use stickers on all baits.
- Place stations where you have seen roaches or have seen evidences of roaches. Most common areas are the kitchen and bathroom. (Food storage and/or food preparation areas and water sources are the most common roach areas).
- Be sure to use all 6 bait stations. Severe roach problems may require you to use more than 1 box.
- Replace all 6 bait stations [at least] every three months, or sooner if roaches return, because they have probably eaten all of the bait [inside]. Use enclosed replacement reminder.



STORAGE AND DISPOSAL

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

DISPOSAL: If empty: Do not reuse this container. Place in trash. 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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Unit Label

The artwork shown below is approximately 200% of actual size.

COMBAT

ROACH KILLING SYSTEM

THIS SIDE DOWN: This side should be placed against surface.

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylnon† 2.0%

OTHER INGREDIENTS: 98.0%

†CAS No. 67485-29-4

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

CAUTION

DISPOSAL: If empty: Do not reuse this container. Place in trash. 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.

[Should you have any questions regarding COMBAT[®], please call 1-800-426-6228. -or-
[For questions or comments, please c] [C]all the Combat[®] [Information] Helpline at
1-800-426-6228 [for more information].]

[Questions or Comments? Call 1-800-426-6228]

Distributed by & ©1997 Combat Insect Control Systems
1221 Broadway, Oakland, CA 94612

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

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND ADDITIONAL PRECAUTIONARY STATEMENTS.

NET WT. _____

R7361-13.1

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

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