64240-2

2-28-2003

Form Approved. OMB No. 2070-0080. Approval expires 2-28-95 Registration Amendment Other Other 3. Proposed Classification None Restricted ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No. Name Inal printed labels in repsonse to gency letter deted Me Too" Application. FEB 2 8 2003 Three copies of the label are enclosed and the Metal Plastic Glass Paper Container No. per container Other Other Other	The state of the s	11.
Registration Amendment Other 3. Proposed Classification None Restricted ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No. Name Insel printed labels in repsonse to gency letter dated Me Too" Application. Inther - Explain below. FEB 2 8 2003 Regging 2. Type of Container Metal Plastic Glass Paper Container No. per container Department of the property of the paper of	<i>+0</i> 03	16
Amendment Other 3. Proposed Classification Ohnson Scood	Form Approved. OMB No. 2079	0-0060. Approval expires 2-28-95
Other 3 Section I duct Maneger ohnson 3. Proposed Classification None Restricted ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No. Name Inel printed labels in repsonse to gency letter dated Me Too" Application. FEB 2 8 2003 The 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Reging 2. Type of Container Metal Plastic Gless Paper Container Other (Specify) 5. Location of Label Directions	Registratio	OPP Identifier Number
duct Manager ohnson 3. Proposed Classification ohnson None Restricted ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No. Name Inel printed labels in repsonse to gency letter dated Me Too" Application. Ither - Explain below. FEB 2 8 2003 Ither - Explain below. FEB 2 8 2003 Ither - Explain below. FEB 2 8 2003 Ither - Explain below. Ither - Explain below. FEB 2 8 2003		nt SC0038
duct Meneger ohnson 3. Proposed Classification None Restricted Restricted Restricted 3. Proposed Classification None Restricted Restr	<u>✓</u> Other	
ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No	- Section I	
ited Reveiw. In accordance with FIFRA Section 3(c)(3) product is similar or identical in composition and labeling g. No. Name Inal printed labels in repsonse to gency letter dated Me Too" Application. Ither - Explain below. FEB 2 8 2003 Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Plastic Gless No. per container Descriptions See 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Plastic Gless No. per container Descriptions See 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Plastic Gless No. per container Descriptions See 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Plastic Gless Paper Other (Specify)	duct Manager	3. Proposed Classification
Product is similar or identical in composition and labeling D. No. Name Inal printed labels in repsonse to gency letter dated Me Too" Application. PEB 2 8 2003 Replace 98-10. Reformatted text layout under 'Application Instructions' and highlighted. Three copies of the label are enclosed and the Plastic Glass Paper Container No. per container Other (Specify) 5. Location of Label Directions	ohnson	None Restricted
Product is similar or identical in composition and labeling D. No. Name Inal printed labels in repsonse to gency letter dated Me Too" Application. Ither - Explain below. FEB 2 8 2003 Reging 2. Type of Container Metal Plastic Glass Paper Container D. Location of Label Directions 5. Location of Label Directions		
net printed labels in repsonse to gency letter dated We Too" Application. ther - Explain below. FEB 2 8 2003 e 98-10. Reformatted text layout under 'Application Instructions' and highlighted. Three copies of the label are enclosed and the Reging 2. Type of Container Metal Plastic Glass Paper Container Other (Specify) 5. Location of Label Directions	product is similar or identical	
mal printed labels in repsonse to gency letter dated Me Too" Application. There - Explain below. The 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the Reging 2. Type of Container Metal Plastic Glass Paper Container No. per container 5. Location of Label Directions	J. 140.	1,0
gency letter dated Me Too" Application. ther - Explain below. FEB 2 8 2003 see 98-10. Reformatted text layout under 'Application Instructions' and highlighted. Three copies of the label are enclosed and the label are enclosed and the label are enclosed and the label	Name	
gency letter dated Me Too" Application. ther - Explain below. FEB 2 8 2003 see 98-10. Reformatted text layout under 'Application instructions' and highlighted. Three copies of the label are enclosed and the label are enclosed and the label are enclosed and the label		
xaging 2. Type of Container Metal Plastic Glass No. per container Other (Specify) 5. Location of Label Directions	gency letter deted Me Too* Application.	NOTIFICATION
No. per container No. per container No. per container Other (Specify) 5. Location of Label Directions		
No. per container Other (Specify) 5. Location of Label Directions	M	fletal flastic
	No. per	aper
Other	5. Location of Label C	Directions
	Other	

Please read instructions on reverse before completing form.

United States Environmental Protection Agency Washington, DC 20460		v	Registration Amendme Other		SC0038	
	Application	n for Pesticide - Se	action			
1. Company/Product Number 64240-2		2. EPA Product N Marion Johnso				posed Classification None Restricted
4. Company/Product (Name) Combate Roach Killing System		PM# 10	·			
Combat Insect Control System c/o PS&RC P. O. Box 493 Pleasanton, CA 94566-0803	CDA Data Ala					nposition and labeling
		Section - II				
Amendment - Explain below. Resubmission in response to Agency letter dated						
Explanation: Use edditional page(s) if necessary. (For section I and Section II.) Notification of non-mandatory labeling text and bracketed text in accordance with PR Notice 98-10. Reformatted text layout under 'Application Instructions' (note, no text was deleted from latest EPA stamped label). New additions are underlined and highlighted. Three copies of the label are enclosed and the 98-10 Certification statement is attached.						
		Section - III				
1. Material This Product Will Be Packag Child-Resistent Packaging Yes No No Certification must be submitted 1. Material This Product Will Be Packag Unit Pack	caging 8	Water Soluble Packaging Yes No If "Yes" No. p Package wgt Conta		F	ntainer Metal Plastic Glass Paper Other (Sp	pecify)
3. Location of Net Contents Information Lebel Container	4. Size(s) Reta	etail Container 5. Location of Label Directions				
6. Manner in Which Label is Affixed to I	Product Lithogra Paper g Stencile	plued ed	ther			
		Section - IV				
1. Contact Point			ed, if nec			
J. Evelyn Lawson	la l				No.: (Incoude Area Code) 6812 - ≪	
certify that the statements I have a scanney is acknowledge that any knowling both under applicable law.		all attachments thereto are		imprisonment or	ete;	8. Date Application Received (Stamped)
2. Signature Sully S. Cluste	_	3. Title Regulatory Compliance Specialist			in the second se	
4. Typed Name Sally S. Christopher	5	5. Dete February 20, 2003				

(for accompanying OPP SC0038) 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.

FEB 2 8 2003

Sally S. Christopher Regulatory Compliance Specialist

for:

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

February 20, 2003

Note: Bold. Italicized text is information for the reader and is not earl of the label. [Bracketed information is optional text.] Underlined text is new, Strike-through (text) means removed.





ROACH KILLING SYSTEM



[See end -or- side -or- bottom -or- back panel for additional precautionary statements) [See precautionary statements on side -or- back panel]

ACTIVE INGREDIENT: Hydramethylnon† 2.0% †CAS No. 67485-29-4

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

[U.S. Patent Nos. _____ and other patents pending.]



Distributed by & @1997 **COMBAT Insect Control Systems** 1221 Broadway, Oakland, CA 94612

12.25' x 2.25'l [CONTAINS] CHILD-RESISTANT BAIT STATIONS

TOTAL NET WT

浸	SYSTEM
	COLLING S
B	ROACI

FRECAUT: ONARY STATEMENTS:

FAZARDS 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.

R7361-13.2

NOTIFICATION



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

<u>Underlined text is new.</u> Strike-through (text) means removed.



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 reaches.]

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.



Luryu, 1" in 1-1/2" Cockroach. Habits: Primarily live and braed authors and enter bomes in search of load. Ball stallen placement near patential points of ontry is lay.



Small, 1/2" Cockreech. Habita: Primarily live and brood in moist areas like kitchess and bathrooms. Mann hall stations are required for? inflective 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:

Roaches enter [the] balt station and eat the balt.

2 Roaches take the balt back to the nest.

Roaches share the balt, killing other roaches and destroying the nest.

[THIS IS] [HOW] COMBAT® WORKS:

Roaches enter [the] belt station and eat the belt.

Proaches return to their nest and die.

Other roaches eat them and die, creating a chain reaction.



(- THREE MONTHS OF EFFECTIVE CONTROL)* - EASY TO USE - NOTHING TO ACTIVATE - NO VAPOR. FUMES OR ODOR

EFFECTIVENESS GUAPAUTEE: COMBAT[®] steads behind this lowest billing system with a fell Salisfaction Guarantee.

Should you have any questions regarding COMBAT[®], please call 1-886-426-8228.

_claims for Ireat or back

for small reaches:

- Kills eggs and roaches <u>-or- roaches</u> and eggs at their source
- · Prevents roach reproduction
- · Prevents egg hatching
- I• The Domino Effect™1
- 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

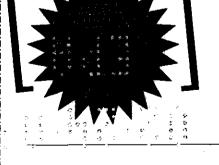
for large reaches:

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

[* not for 6 count]

-ead of claims for froat or back-

R7361-13.2





-DIRECTIONS FOR USE CONTINUED:

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove or puncture label on bait stations.

APPLICATION INSTRUCTIONS

[For best results] use all 8 -or- 12 -or- 18 bait[s] [stations] [at the same time for thorough control.]
 [Remove wrapper.] [Open pouch and separate the bait stations from plastic frame.] [Now the baits are ready to use.]

Break [COMBAT®] bait[s] [stations] apart. Do not remove or puncture [the] label[s] on bait station[s].

Place bait[s] [stations] wherever you see [or have seen] roaches -or- signs of roaches [- at least 6_or-10 bait stations in the kitchen and 2 in each bathroom], as shown in diagrams to the right -or- left.

[Refer to diagram[s] for [other] placement locations.]

[Severe roach problems may require [2 boxes or more.]

[Place bait stations wherever roaches are seen -or- near doors and windows]

[Specific placement areas include under] [appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers].[(under refrigerator and appliances, inside cabinets and drawers)]

Place [baits] properly so [that] they are touching walls and corners.
 [Do not use sprays or foggers [around] [on or near] baits [; they can contaminate bait stations and reduce effectiveness.]

[(Food storage and water sources are the most common roach areas)]

[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.]

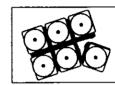
[Bait[s] [stations] work best [on horizontal surfaces] [when] touching corners and walls.]

[Use enclosed stickers for vertical surfaces.]

[Use -or- Only use enclosed stickers when placing them upside down for on walls].

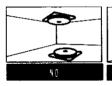
[Use enclosed stickers as needed.] [It is not necessary to use stickers on all baits.]

3. Replace all 6 -or- 8 -or- 12 -or- 18 bait[s] [stations] [at least] every 3 months, or sooner if infestation is heavy -or- [roaches] [they] return [, because roaches -or- they have probably eaten all of the bait [inside]. [Use enclosed replacement reminder.].

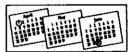












Directions for 6 count only:

1. [Remove wrapper.] Break COMBAT bait stations apart. Use all 6 bait stations at the same time.

- 2. Place bait[s] [stations] wherever you see or have seen roaches -or- roaches are seen. Do not use sprays or foggers around -or- on -or- near baits; they can contaminate bait stations and reduce effectiveness
- 3. 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.
- 4. 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.)

5. Be sure to use all 6 built stations. Severe roach problems may require you to use more than 1 box.

6. 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 parity 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.

R7361-13.2



Note: Bold, Halicized text is information for the reader and is not part of the label. [Bracketed information is optional text.] Underlined text is new, Strike-through (text) means removed.

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



ROACH KILLING SYSTEM

[THIS SIDE DOWN or against the surface.]

ITHIS SIDE DOWN: This side should be placed against surface.]

Note: Do not remove or puncture this label.

tCAS No. 67485-29-4

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

DISPOSAL: If comply: Do not reuse this container. Place in trash. If partly filled: Call your local solid waste agency or toll free number 1-898-CLEARUP 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]

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

Distributed by & @1997 Combat Insect Control Systems

Hor areal reaches

1221 Broadway, Oakland, CA 94612

(For large reaches)

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS -OF-ADDITIONAL PRECAUTIONARY STATEMENTS

NET WT.

R7361-13.2