

64240-2

8-9-2007

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Robert S. Brennis
Product Registration
Combat Insect Control Systems
15101 N. Scottsdale Rd.
Scottsdale, AZ 85254

AUG 9 2007

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Minor Label Change
EPA Reg. No. 64240-2
Application Dated July 19, 2007

Dear Mr. Brennis:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/19/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other - Notification	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 64240-2	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Roach Killing System	PM# PM 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15101 N. Scottsdale Rd. Scottsdale, AZ 85254 <u>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</u> <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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: This is a simple notification to add the word Roach under our graphic so customers know what the target pest is. We have added language to identify whether the diagram referred to is to the left, above or below. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. 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 of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the 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.

Section - III

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

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Robert S. Brennis, Lewis & Harrison 122 C St. NW, Suite 740, Washington, DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 20
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.		5. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Combat Insect Control Systems	
4. Typed Name Robert S. Brennis	5. Date July 19, 2007	

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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.

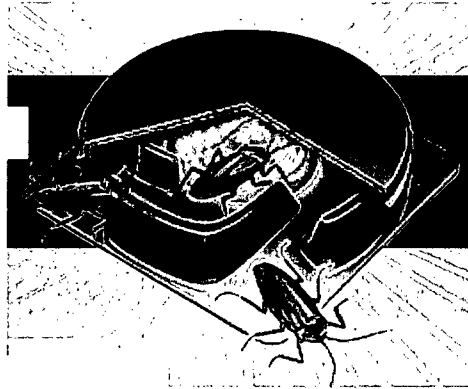
Master Label, July 2007

EPA Reg. No. 64240-2

Combat Roach Killing System

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COMBAT[®] Roach Killing System



[Kills][For] Small Roaches

-or-

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

[ROACH]

ACTIVE INGREDIENT: Hydramethylo[†] 2.0%

OTHER INGREDIENTS: 98.0%

[†]CAS No. 67485-29-4

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

CAUTION

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

[See precautionary statements on side -or- back panel.]

EPA Reg. No. 64240-2

EPA Est. No. 071106-GA-001

Distributed by & ©2007 Combat Insect Control Systems

[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

MADE IN U.S.A.

[For Small Roaches] -or- [For Large Roaches]

Contains] [6] [8] [12] [18] [2.25" x 2.25"]

CHILD-RESISTANT BAIT STATIONS

[TOTAL] NET WT. [0.21oz (6g)] [0.28oz (8g)] [0.370 oz. (10.5g)] [0.42 oz. (12g)]

[0.494 oz. (14g)] [0.63 oz. (18g)] [0.741oz. (21g)] [1.013 oz. (31.5g)]

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

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Master Label, July 2007
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Combat Roach Killing System
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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.

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 partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

[THIS IS] [HOW] COMBAT® [ROACH KILLING SYSTEM] WORKS:

- [1.] Roaches enter [the] bait station and eat the bait.
- [2.] [Roaches take the bait back to the nest.] *-or-* [Roaches return to their nest and die.]
- [3.] [Roaches share the bait, killing other roaches and destroying the nest.] *-or-* [Other roaches eat them and die, creating a chain reaction.]



[This product is specifically 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.]*

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DIRECTIONS FOR USE, continued

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove or puncture label on bait stations.

APPLICATION INSTRUCTIONS

1. [For best results] Use all 6 ***-or-*** 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 [left] [above] [below] [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)]

2. 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 ½ feet away.]

[The more bait stations place out, the more roaches find the bait.]

[This means faster and more effective control of your roach problem.]

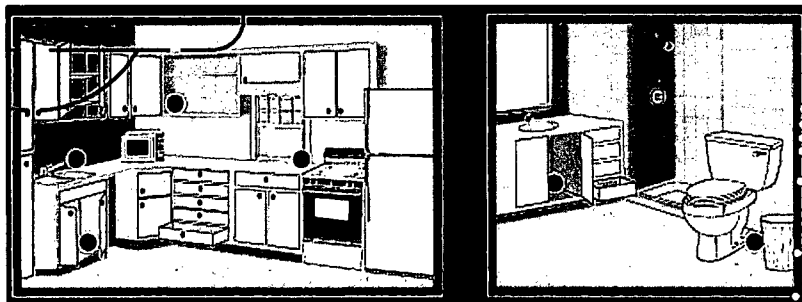
[Bait[s] [stations] work best [on horizontal surfaces] [when] touching corners and walls.]

[Use enclosed stickers for vertical surfaces.]

[Use ***-or-*** Only use enclosed stickers when placing them upside down [or 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 USE, APPLICATION INSTRUCTIONS, continued

Optional 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 preparation areas and water sources are the most common roach areas.)
5. Be sure to use all 6 bait 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.]

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Claims for Front or Back:

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

[Easy to use]

[Nothing to activate]

[No vapor, fumes or odor]

[Bonus Pack] (applies to packs to which more baits are added)

[50% More Free] (applies to packs to which 50% more baits are added)

[6 Bonus Baits With Purchase] (applies to packs to which 6 more baits are added)

For Small Roaches:

- [This product is specifically designed for small roaches.]
- Kills eggs and roaches [or roaches and eggs] 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
- [Kills roaches & eggs for 3 months]*
- Kills roaches at their source
- [Three months effective control]*

For Large Roaches:*

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

[*Not for 6 count]

[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

Guaranteed to work [or your money back]! [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.]



[[The paperboard in this] [C]arton [contains] [is made from] _____% Recycled fiber
[minimum _____% post consumer content]] [Please Recycle Empty Carton.]

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Combat Roach Killing System
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UNIT LABEL

COMBAT[®] Roach Killing System

[THIS SIDE DOWN [OR] AGAINST [THE] SURFACE.]
[THIS SIDE DOWN: This side should be placed against the surface.]
Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylon† 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 partially filled:** Call you 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] [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 & ©2007 Combat Insect Control Systems
[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254
MADE IN USA

EPA Reg. No. 64240-2
EPA Est. No. 071106-GA-001

[FOR SMALL ROACHES]
[FOR LARGE ROACHES]

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

NET WT. [0.035oz (1g)] [0.062oz (1.75g)]