

64240-2

11/10/2009

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

NOV 10 2009

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Ms. Georgia Anastasiou  
Lewis & Harrison  
122 C Street N. W. Suite 740  
Washington, D.C. 20001

Dear Ms. Anastasiou:

Subject: Label Amendment  
Combat® Roach Killing System  
EPA Registration Number: 64240-2  
Application Dated: August 3, 2009  
Decision: 418556

The Agency has considered your request to maintain the following marketing claim: "Advanced [food] formula§ § [versus] [vs] the previous Combat bait formula" on your product labeling. This letter supersedes the Agency letter dated October 28, 2009. A copy of this letter has been placed in the file for this product.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy of this review has been placed in your file.

If you have any questions, please contact Melody Banks on 703 305-5413.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Nesci".

Kimberly Nesci  
Product Manager 11  
Insecticide Branch  
Registration Division 7507P

Enclosure: Copy of Stamped Approved Label

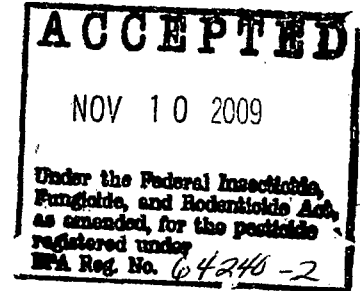
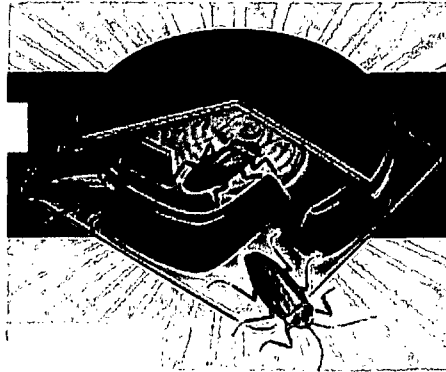
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Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text]

Master Label, November 10, 2009  
EPA Reg. No. 64240-2  
Combat Roach Killing System  
Pg 1 of 6

# COMBAT<sup>®</sup> Roach Killing System

*Alternate Brand Names:*  
**Combat Source Kill 1**  
**Combat Source Kill 2**



*OPTIONAL Example of an illustration depicting a cut-away view of a bait station and roaches.*

[Kills][For] Small Roaches

*-or-*

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

[ROACH]

ACTIVE INGREDIENT: Hydramethylnon<sup>†</sup> ..... 2.0%

OTHER INGREDIENTS: ..... 98.0%

<sup>†</sup>CAS No. 67485-29-4

**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.]

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

EPA Reg. No. 64240-2      EPA Est. No. \_\_\_\_\_

Distributed by & ©2009 Combat Insect Control Systems

[19001 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85255

MADE IN U.S.A.

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

[Contains] [6] [8] [12] [18]

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)]

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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. Pets may be attracted to the smell of the bait. Place baits in areas inaccessible to pets.

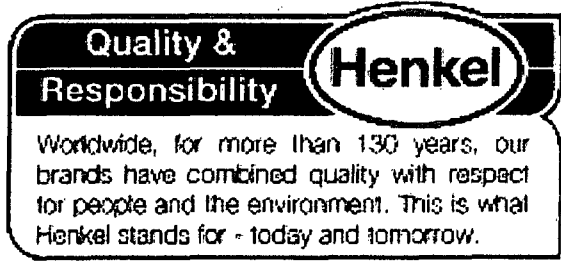
**FIRST AID:** If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.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

**STORAGE AND DISPOSAL**

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

**DISPOSAL:** If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid water agency [or [toll free number] 1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

*For front or back or side panel:*



-or-



[Combat®] [Guaranteed to work [or your money back!]  
[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]  
[For information,] [C]call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information]. -or- For questions or comments, please call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information].

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

[U.S. Patent Nos. \_\_\_\_\_ and other patents pending.]

*{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}*

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Combat Roach Killing System  
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### 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] [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] [roaches] 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.]

*Place holder for optional picture of a large roach.*

[Small, 1/2" Cockroach. Habits: Primarily live and breed in moist areas like kitchens and bathrooms.]

*Place holder for optional picture of a small roach.*

[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] [Combat Source Kill 1 and Combat Source Kill 2 *or other approved Alternate Brand Names*] for effective [maximum] roach control.]

[THIS IS] [HOW] COMBAT® [ROACH KILLING SYSTEM] [*Alternate Brand Name*] 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.]



*OPTIONAL Example of illustrations to depict how this product works.*

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## DIRECTIONS FOR USE

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

### [APPLICATION INSTRUCTIONS]

1. [For best results] Use all [6] [8] [12] [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 1½ 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] [8] [12] [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.]



*OPTIONAL Example illustration of suggested bait station placement sites.*

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***Claims:***

- 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
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor
- Advanced [food] formula<sup>§</sup> § [versus] [vs.] the previous Combat bait formula
- Bonus Pack\*  
*\*applies when more baits are included vs. a smaller standard pack size, as indicated by revised net contents on front panel, e.g., "18 Bait Stations", not to exceed 18 total*
- 50% More Free\*\*  
*\*\*applies when 50% more baits are included vs. a smaller standard pack size, as indicated by revised net contents on front panel, e.g., "18 Bait Stations", not to exceed 18 total*
- 6 Bonus Baits With Purchase\*\*\*  
*\*\*\*applies when 6 more baits are included vs. a smaller standard pack size, as indicated by revised net contents on front panel, e.g., "18 Bait Stations", not to exceed 18 total*

***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

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Combat Roach Killing System  
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UNIT LABEL

# COMBAT<sup>®</sup> Roach Killing System

*Alternate Brand Names:*  
**Combat Source Kill 1**  
**Combat Source Kill 2**

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

ACTIVE INGREDIENT: Hydramethylnon<sup>†</sup> ..... 2.0%  
OTHER INGREDIENTS: ..... 98.0%  
<sup>†</sup>CAS No. 67485-29-4

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

**DISPOSAL: If empty:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid water 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<sup>®</sup>, please call 1-800-426-6228] [For questions or comments, please call the COMBAT<sup>®</sup> Information Helpline at 1-800-426-6228 for more information.] [Questions or Comments? Call 1-800-426-6228]

Distributed by & ©2009 Combat Insect Control Systems  
[19001 N. Scottsdale Rd.,] Scottsdale, AZ 85255  
[MADE IN USA]

EPA Reg. No. 64240-2  
EPA Est. No. \_\_\_\_\_

[FOR SMALL ROACHES]  
[FOR LARGE ROACHES]

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

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