

64240-2

3/17/2011

1/7



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

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Combat Insect Control Systems  
c/o Lewis & Harrison  
122 C Street, N.W., Suite 740  
Washington, D.C. 20001

MAR 17 2011

Subject: Amendment for Child-resistant Packaging Certification  
EPA Reg. No. 64240-2  
Submission dated October 26, 2010  
Decision No: 441583, S: 884631

Dear Ms. Anastasiou:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, subject to the condition below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

- As a condition of this amendment, new confirmatory child-resistant packaging data conducted with at least nine bait stations must be submitted for the large roach bait stations, which demonstrate continued compliance with the standards of 40 CFR 157.32. These new data must be submitted to the Agency by July 1, 2011.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this action, please contact Rosanna Louie-Juzwiak at (703) 308-0037.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez", written over a large, stylized scribble.

Mark Suarez  
Product Manager 13, Insecticide Branch  
Registration Division (7505P)

Enclosure: Combat Roach Killing System Label, Stamped *Accepted with Comments*

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

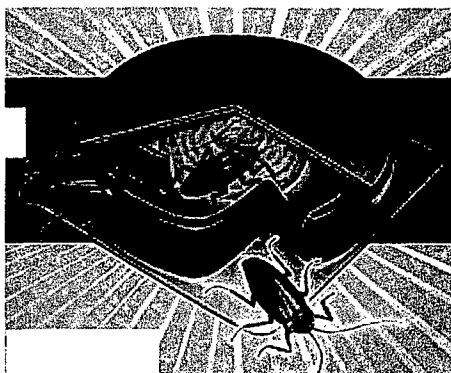
Master Label, March 17, 2011  
EPA Reg. No. 64240-2  
Combat Roach Killing System  
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# COMBAT<sup>®</sup> Roach Killing System

Approved 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%  
TOTAL.....100.00%

<sup>†</sup>CAS No. 67485-29-4

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

MAR 17 2011  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
64240-2

**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 & ©2011 Combat Insect Control Systems

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

MADE IN U.S.A.

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

(Large Roaches:) Contains [6] [8]

(Small 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)]

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

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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 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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### 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] 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.]

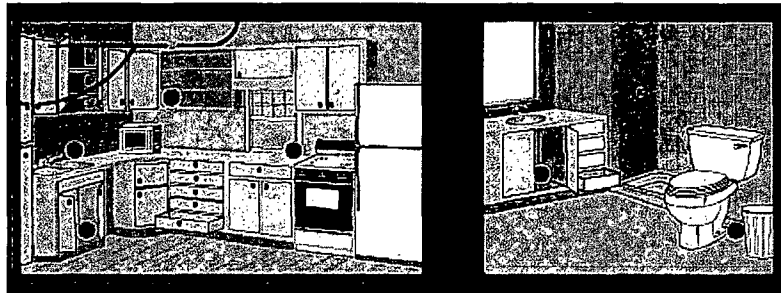
Break [COMBAT<sup>®</sup>] bait[s] [stations] apart. Do not remove or puncture [the] label[s] on bait station[s]. Place bait[s] [stations] wherever you see [or have seen] roaches **-or-** signs of roaches [at least 6 **-or-** 8 bait stations in the kitchen and 2 in each bathroom] as shown in diagrams 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 for small stations and 8 total for large stations*

- 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 for small stations and 8 total for large stations*
- 6 Bonus Baits With Purchase\*\*\*  
*\*\*\*applies when 6 more small 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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UNIT LABEL

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

*Approved 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%  
TOTAL.....100.0%

<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 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 c] [C]all the COMBAT<sup>®</sup> Information Helpline at 1-800-426-6228 for more information.]] [Questions or Comments? Call 1-800-426-6228]

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[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)]