

64240-2

7/9/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 WASHINGTON DC 20460

OFFICE OF CHEMICAL SAFETY  
 AND POLLUTION PREVENTION

Ms Georgia Anastasiou  
 Agent for Combat Insect Systems  
 Lewis & Harrison  
 122 C Street N W Suite 740  
 Washington DC 20001

JUL - 9 2012

Subject Label Notification(s) for Pesticide Registration Notice 98 10

Dear Ms Anastasiou

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 dated June 26 2012 for the following product(s)

<b>Combat Roach Killing Bait S</b>	<b>Alternate Brand Names</b>
<b>Combat Roach Killing Bait L</b>	

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98 10 and finds that the label change(s) requested falls within the scope of PRN 98 10 The label has been date stamped Notification and will be placed in our records

**Combat<sup>o</sup> Roach Killing System EPA Reg No 64240 2**

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely

*Richard J Gebken*

Richard J Gebken  
 Product Manager  
 Insecticide Branch  
 Registration Division (7504P)

Please read instructions on reverse before completing form

Form Approved OMB No 2070 0060 Approval expires 05 31 98

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

1 Company/Product Number <b>64240 2</b>	2 EPA Product Manager <b>Mark Suarez</b>	3 Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) <b>Combat Roach Killing System</b>	PM# <b>11</b>	
5 Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> <b>c/o Henkel Consumer Goods Inc</b> <b>19001 N Scottsdale Rd</b> <b>Scottsdale AZ 85255</b> <i>NOTE PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW</i> <input type="checkbox"/> Check if this is a new address	6 <b>Expedited Review</b> In accordance with FIFRA Section 3(c)(3) (b)(I) my product is similar or identical in composition and labeling to <div style="text-align: center; font-size: 1.2em; font-weight: bold;">NOTIFICATION</div> EPA Reg No _____ Product Name <b>JUL - 9 2012</b>	

**Section II**

<input type="checkbox"/> Amendment Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> <b>Notification Explain below</b>	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Me Too Application <input type="checkbox"/> Other Explain below
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**Explanation** Use additional page(s) if necessary (For Section I and Section II)

**Notification of the Alternate Brand Names**

**Combat Roach Killing Bait S and Combat Roach Killing Bait L**

Notification in Accordance With PR Notice 98 10 This notification is consistent with the provisions of PR Notice 98 10 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 EPA I further understand that if this notification is not consistent with the terms of PR Notice 95 2 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be the 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 type="checkbox"/> No  <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No if Yes Unit Packaging wgt    No per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No if Yes Package wgt    No per container	2 Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
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"/> 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 type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

**Section - IV**

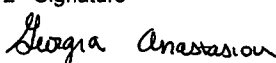
1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)

Name <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b> <b>122 C St NW #740 Washington DC 20001</b>	Title <b>Agent for Combat Insect Control Systems</b>	Telephone No (Include Area Code) <b>202 393 3903 ext 19</b>
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**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 	3 Title <b>Agent for Combat Insect Control System</b>	
4 Typed Name <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b>	5 Date <b>June 26 2012</b>	

# LEWIS & HARRISON

122 C Street N W Suite 740  
Washington D C 20001  
telephone 202 393 3903  
fax 202 393 3906

Consultants in Government Affairs

June 26 2012

**HAND DELIVERED**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
U S Environmental Protection Agency  
One Potomac Yard  
2777 S Crystal Drive  
Arlington VA 22202

**ATTENTION**            **Mark Suarez**  
                                 **Product Manager Team 11**

**SUBJECT**                **Combat Insect Control Systems**  
                                 **Combat Roach Killing System (EPA Reg No 64240 2)**  
                                 **Notification per PR Notice 98 10 Alternate Brand Names**

Dear Mr Suarez

On behalf of Combat Insect Control Systems I submitting a notification to propose the following alternate brand names for the product Combat Roach Killing System (EPA Reg No 64240 2)

**Combat Roach Killing Bait S**  
**Combat Roach Killing Bait L**

In support of this submission enclosed please find an Application for Pesticide Notification which includes a signed statement certifying compliance with PR Notice 98 10 and a copy of the master label with the proposed brand names

If you have any questions please contact me at 202 393 3903 ext 19 or by email at georgia@lewisharrison.com

Sincerely



Georgia Anastasiou  
Agent for  
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

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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 June 26 2012  
EPA Reg No 64240 2  
Combat Roach Killing System  
Pg 1 of 6

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

*Approved Alternate Brand Names*

**Combat Source Kill 1**

**Combat Source Kill 2**

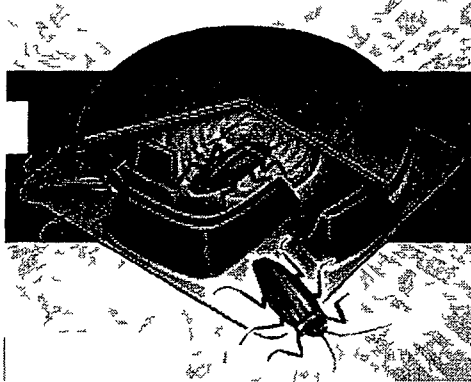
*Proposed Alternate Brand Names*

**Combat Roach Killing Bait S**

**Combat Roach Killing Bait L**

**NOTIFICATION**

**JUL - 9 2012**



*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

**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 37oz (10 5g)] [0 42 oz (12g)]

[0 494 oz (14g)] [0 63 oz (18g)]

st9

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[Bracketed information is optional text]

Master Label June 26 2012  
EPA Reg No 64240 2  
Combat Roach Killing System  
Pg 2 of 6

**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

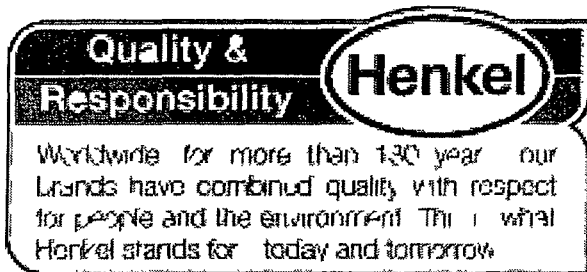
**FIRST AID** If on skin or clothing Take off contaminated clothing Rinse skin immediately  
with plenty of water for 15 20 minutes Call a poison control center or doctor for treatment  
advice Have the product container or label with you when calling a poison control center or  
doctor or going for 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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Master Label June 26 2012  
EPA Reg No 64240 2  
Combat Roach Killing System  
Pg 3 of 6

### 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 ½ Cockroach Habits Primarily live and breed outdoors and enter ho nes in search of food Bait station placement near potential points of entry is key ]

*Place holder for optional picture of a large roach*

[Small ½ Cockroach Habits Primarily live and breed in moist areas like kitchens and batrooms ]

*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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Master Label June 26 2012  
EPA Reg No 64240 2  
Combat Roach Killing System  
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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 ]

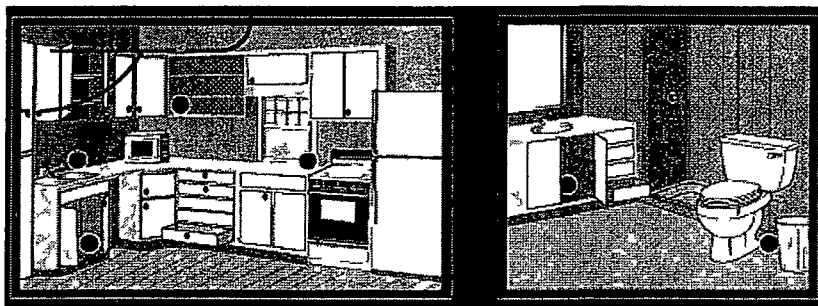
Break [COMBAT®] bait[s] [stations] apart Do not remove or puncture [the] label[s] or bait  
station[s] Place bait[s] [stations] wherever you see [or have seen] roaches **-or-** signs of  
roaches [at least 6 **-or-** 8 bait stations in the kitchen and 2 in each bathroom] as shown in  
diagrams to the 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*

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

***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 Comba 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 12 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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Master Label June 26 2012  
EPA Reg No 64240 2  
Combat Roach Killing System  
Pg 6 of 6

UNIT LABEL

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

*Approved Alternate Brand Names*

**Combat Source Kill 1**

**Combat Source Kill 2**

*Proposed Alternate Brand Names*

**Combat Roach Killing Bait S**

**Combat Roach Killing Bait L**

[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]

Distributed by & ©2011 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)]