

64240-2

1 8/15/2013

1/9



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

AUG 15 2013

Georgia Anastasiou  
Combat Insect Control Systems  
122 C Street, Suite 505  
Washington, DC 20001

Subject: Notification – Correct and add marketing language  
Combat Roach Killing System  
EPA Reg. No. 64240-2

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 10, 2013 for the product **Combat Roach Killing System (EPA Reg. No. 64240-2)**. The Registration Division (RD) has conducted a review 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.

If you have any questions, please call me directly at 703-305-0120.

Sincerely,

A handwritten signature in black ink that reads "Mark Suarez".

Mark Suarez  
Product Manager Team 13  
Registration Division (7505P)  
Office of Pesticide Programs

Handwritten initials in black ink, possibly "MS" or "b", written vertically to the left of the typed name.

 <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
--	---	-----------------------

**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 Lewis &amp; Harrison, LLC</b> <b>122 C Street, Suite 505</b> <b>Washington, DC 20001</b> <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-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ <b>AUG 15 2013</b> _____  Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated ____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
---	---

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)


**Notification to make minor changes to the label. Please read cover letter for details.**

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	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)
*Certification must be submitted		3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container
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		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	

**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>	Title: <b>Agent for Combat Insect Control Systems</b>	Telephone No. (Include Area Code) <b>202-393-3903 ext. 19</b>
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 <b>(Stamped)</b>
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 10, 2013</b>	

3/9

# LEWIS & HARRISON

122 C Street, N.W., Suite 505  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

Consultants in Government Affairs

June 10, 2013

**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**

Dear Mr. Suarez:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product Combat Roach Killing System (EPA Reg. No. 64240-2). The purpose of this notification is to make the following changes to the label:

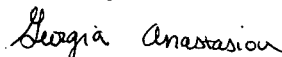
1. Correct the language in the Precautionary statements to include the language "Wash thoroughly with soap and water after handling and...."
2. Add the marketing language "[Destroys] [kills] the nest". Please note this language is a reiteration of claims that are currently approved.

In support of this submission enclosed please find the following documents:

- a) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- b) One (1) copy of the label with changes highlighted; and,
- c) Two (2) copies of the revised label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com).

Sincerely,



Georgia Anastasiou  
Agent for Combat Insect Control Systems

cc: Patricia McFadden (Combat Insect Control Systems)

4/9

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

Master Label June 10, 2013  
EPA Reg. No. 64240-2  
Combat Roach Killing System  
Pg 1 of 6

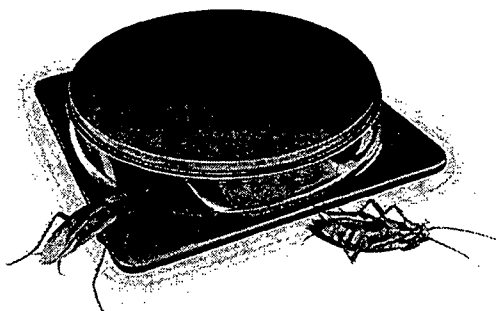
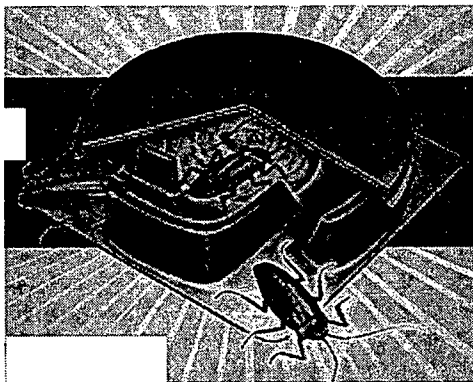
# COMBAT<sup>®</sup> Roach Killing System

NOTIFICATION

*Approved Alternate Brand Names:*

- Combat Source Kill 1
- Combat Source Kill 2
- Combat Roach Killing Bait S
- Combat Roach Killing Bait L

AUG 15 2013



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

[Kills][For] Small Roach[es]

*-or-*

[Kills][For] Large Roach[es][, Waterbugs & Palmetto Bugs]

[ROACH]ES]

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 & ©2012 Combat Insect Control Systems

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

[MADE IN [U.S.A.][KOREA]]

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

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

*(Small Roaches:)* [Contains] [6] [8] [12] [18]

CHILD-RESISTANT BAIT[S] [STATIONS]

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

[0.49oz. (14g)] [0.63 oz. (18g)]

5/9

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

Master Label June 10, 2013  
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 thoroughly with soap and water after handling and 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.

*{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.}*

***Optional Henkel Quality statement for front or back or side panel:***



[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.]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

6/9

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

[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.*

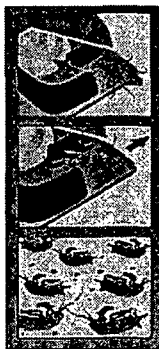
[Small, 1/2" Cockroach. Habits: Primarily live and breed in moist areas like kitchens and bathrooms.]

*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.*

7/9

## 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.]

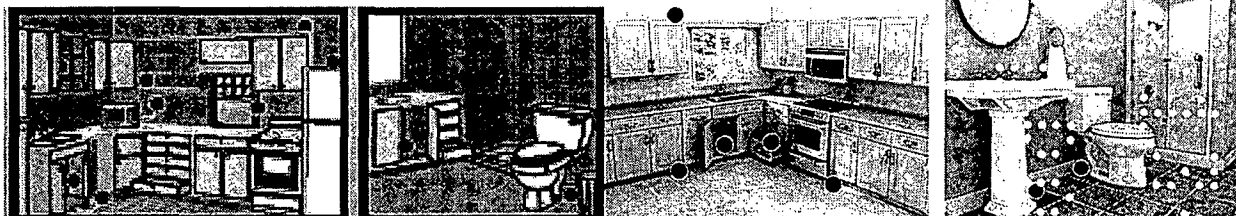
Break [COMBAT®] bait[s] [stations] apart [from plastic frame]. Do not remove or puncture [the] label[s] on bait station[s]. Place bait[s] [stations] wherever you see [or have seen] roaches **-or-** signs of roaches [at least 6 **-or-** 8 bait stations in the kitchen and 2 in each bathroom] as shown in 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 [bait[s] [stations] properly so [that] they are touching walls and corners. [Do not use sprays or foggers [around] [on or near] bait[s] [stations] [: 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
- Child resistant bait[s] [stations]
- 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 [&] [and] eggs for 3 months
- Kills roaches at their source
- [Destroys] [kills] the nest
- Three months effective control

**For Large Roaches:\***

- Kills roaches at their source
- Large bait kills large roaches
- Solves large roach problems
- [Destroys] [kills] the nest



9/9

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

Master Label June 10, 2013  
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
- 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]

[ ]For large roaches] [For small roaches]

Distributed by & ©2011 Combat Insect Control Systems  
 [19001 N. Scottsdale Rd.,] Scottsdale, [AZ] [Arizona] 85255 EPA Reg. No. 64240-2  
 [MADE IN USA] [MADE IN KOREA] EPA Est. No. \_\_\_\_\_

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)]