



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 18, 2016

Georgia Anastasiou
Agent for Combat Insect Control Systems
c/o Lewis & Harrison
122 C Street, N.W. Suite 505
Washington, DC 20001

Subject: Label Amendment – Revising company address, adding claims, and additional marketing statements.
Product Name: Combat Roach Killing System
EPA Registration Number: 64240-2
Application Date: October 15, 2015
Decision Number: 510505

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

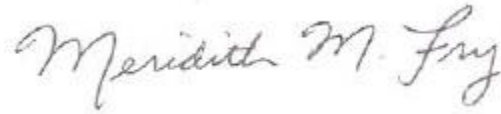
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Meredith M. Fry".

Meridith M. Fry, Ph.D., Product Manager 4
Invertebrate & Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

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

Master Label April 14, 2016
EPA Reg. No. 64240-2
Combat Roach Killing System
Pg 1 of 7

COMBAT[®] 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

ACCEPTED

Apr 18, 2016

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



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[†] 2.0%
OTHER INGREDIENTS: 98.0%
TOTAL.....100.0%

[†]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 & © [Year] Combat Insect Control Systems

[7201 E. Henkel Way] [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. _____

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

Master Label April 14, 2016
EPA Reg. No. 64240-2
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 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

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

CONTAINER HANDLING: 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 waste 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.]

[USE 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.

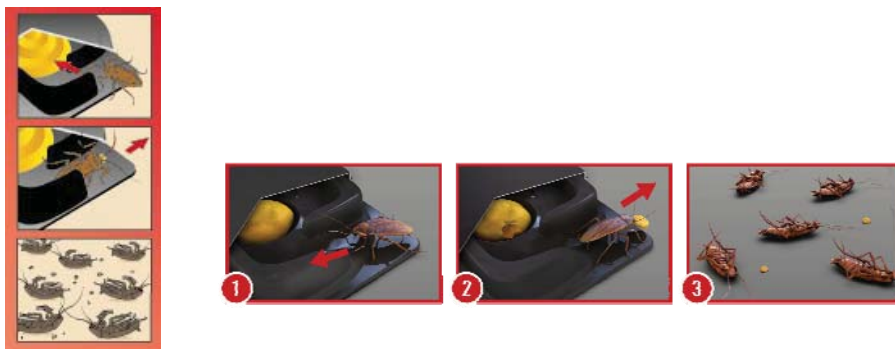
[If you have seen both types of cockroach in your home, it is strongly suggested that you purchase both [sizes of COMBAT[®] Roach Killing System] [Combat Source Kill 1 and Combat Source Kill 2 ***or other approved Alternate Brand Names***] for effective [maximum] roach control.]

[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.

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 [X] 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 [X] 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.

Claims:

- Laboratory and home use test prove COMBAT[®] provides 3 months of effective control (for small roaches).
- Kills roaches 24/7
- Kills Non-stop
- Effective killing
- 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[§] § [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*
- [x] [x [Bait]] [x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X][Extra] [Free] [Bonus] [Bait(s)]^{††} [With Purchase]^{††} [for free]
- More Baits [- Better Value]
- Value Pack [- More Baits]
- Value Size [- More Baits]
- Bonus Pack
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack
- Kill the ones you see and the ones you don't [see]
- [Your] Secret weapon [against roaches]

^{††} vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]



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
- Kills roaches 24/7 for up to 3 months
- Keeps on killing[for] up to 3 months
- Kills non-stop [for] up to 3 months
- Effective killing [for] up to 3 months

For Large Roaches:*

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

UNIT LABEL

COMBAT[®] 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[†] 2.0%
OTHER INGREDIENTS: 98.0%
TOTAL.....100.0%

[†]CAS No. 67485-29-4

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

CONTAINER HANDLING: 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 waste agency 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]

[For large roaches] [For small roaches]

Distributed by & © [Year] Combat Insect Control Systems
[7201 E. Henkel Way] [AZ] [Arizona] 85255
[MADE IN USA] [MADE IN KOREA]

EPA Reg. No. 64240-2
EPA Est. No. _____

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND [ADDITIONAL] PRECAUTIONS

-or-

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND [ADDITIONAL] PRECAUTIONARY STATEMENTS

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