



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 8, 2019

Christina M. Swick
Agent for Combat Insect Control Systems c/o Henkel Corporation
Lewis and Harrison
2641 S. Clark St., Suite 710
Arlington, VA 22202

Subject: Notification per PRN 98-10 – revised marketing claims, address change and minor formatting changes
Product Name: COMBAT ROACH KILLING SYSTEM
EPA Registration Number: 64240-2
Application Date: 3/5/19
Decision Number: 549510

Dear Ms. Swick:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact Vanessa Emerson by email at emerson.vanessa@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive, somewhat stylized font.

Elizabeth Fertich
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

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

Master Label March 2019
EPA Reg. No. 64240-2
Combat Roach Killing System
Pg 1 of 7

NOTIFICATION

64240-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

04/08/2019

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



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

[Kills][For] Small Roach[es] [&/ +/ and eggs]

-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. [One Henkel Way] [Rocky Hill,

CT] 06067

[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]

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 ½" 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, ½" Cockroach. Habits: Primarily live and breed in moist areas like kitchens and bathrooms.]

Place holder for optional picture of a small roach.

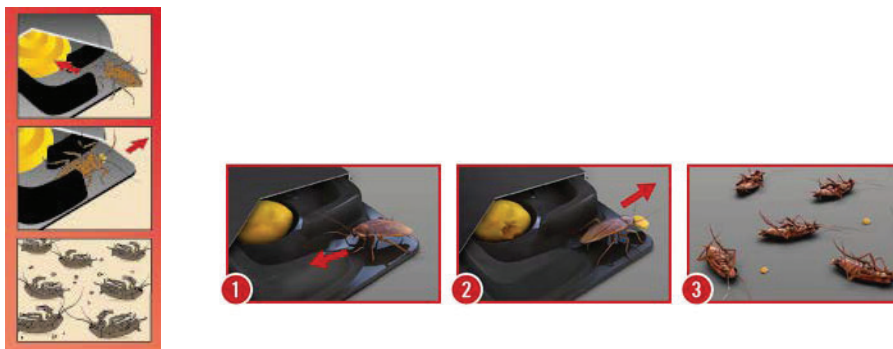
[If you have seen both types of cockroach in your home, it is strongly suggested that you purchase both [sizes of COMBAT® Roach Killing System] [Combat Source Kill 1 and Combat Source Kill 2 ***or other approved Alternate Brand Names***] for effective [maximum] roach control.]

[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.]

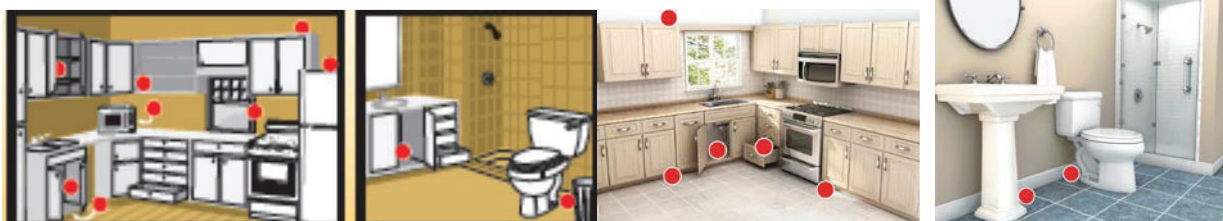
Break [COMBAT[®]] bait[s] [stations] apart [from plastic frame]. Do not remove or puncture
[the] label[s] on bait station[s]. Place bait[s] [stations] wherever you see [or have seen]
roaches **-or-** signs of roaches [at least 6 **-or-** -8 bait stations in the kitchen and 2 in each
bathroom] as shown 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/ABN] 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
[One Henkel Way] [Rocky Hill, CT] 06067
[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)]