

Mr. William C. McCormick  
Maxforce Insect Control Systems  
7200 Johnson Drive  
Pleasanton, CA 94588

Dear Mr. McCormick:

Subject: Amendment- Label & Confidential Statement of Formula  
(CSF)  
Combat Roach Killing System I  
EPA Registration No. 64240-4  
Your Submissions dated May 3, 1994 & January 22, 1995

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

- 1. With respect to the label claims under Copy A:
  - a. Delete "Kills roaches and the eggs they carry for 3 months". Although we approved this claim for smaller roaches no data/information was submitted to support claims for larger roaches.
  - b. Revise the "immune to common insecticides" to "resistant to pyrethroids and organophosphates".
  - c. We find no reference to the term "Aquatech". Either delete or identify.

2. In reference to the CSF dated 1/22/95 for Alternate Formulation A-3:

- a. The certified limits for Hydramethylon do not agree with the certified limits specified in the basic formulation as required in 40 CFR 152.43. Therefore, the CSF for Alternate Formulation A-3 should be revised by changing the upper and lower certified limits for Hydramethylon to 1.20% and 0.80% respectively.

CONCURRENCES

SYMBOL							
SURNAME	JW						
DATE							

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A stamped copy of the label and a copy of the Efficacy Review dated 1/30/95 are enclosed.

Sincerely yours,

George T. LaRocca  
Product Manager (13)  
Insecticide-Rodenticide Branch  
Registration Division (7505C)

Enclosure:

FOR LARGE ROACHES,  
WATERBUGS & PALMETTO BUGS

CLUB ITEM ———— INSTITUTIONAL SIZE  
- or -  
**ECONOMY PACK**



**ROACHES,  
WATERBUGS AND  
PALMETTO BUGS  
KILLS ROACHES & THE EGGS  
THEY CARRY FOR 3 MONTHS**

MAY 23 1995

VEA INSTRUCCIONES EN  
ESPAÑOL EN LA CAJA

**COMBAT**  
**ROACH  
KILLING  
SYSTEM 1**

**FOR  
LARGE  
ROACHES,  
WATERBUGS AND  
PALMETTO BUGS  
Kills Asian Roaches**

CONTAINS \_\_\_ CHILD-  
RESISTANT BAIT STATIONS

TOTAL NET WT \_\_\_\_\_



ACTIVE INGREDIENT: Hydramethylnon (tetrahydro-5, 5-dimethyl-2(1H)-pyrimidinone)-2-(4-trifluoromethylphenyl)-1-(2-(4-trifluoromethylphenyl) ethenyl)-2-propanoylhydrazono)..... 1.0%  
INERT INGREDIENTS:..... 99.0%

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



**ROACH  
KILLING SYSTEM 1  
FOR LARGE ROACHES,  
WATERBUGS & PALMETTO BUGS**

**FOR LARGE ROACHES,  
WATERBUGS AND  
PALMETTO BUGS  
KILLS ROACHES & THE EGGS  
THEY CARRY FOR 3 MONTHS**



**ROACH  
KILLING SYSTEM 1**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 64240-4

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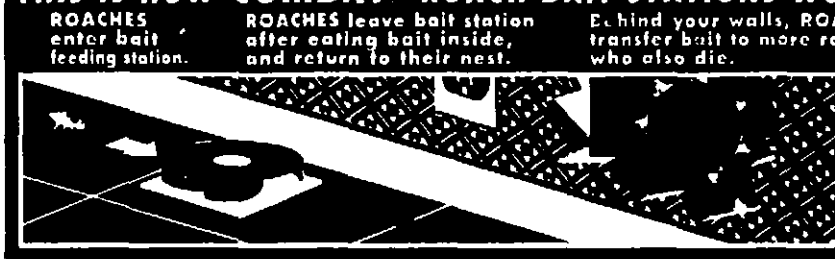


**GUARANTEED TO WORK**  
or your money back!  
For more information, call the  
Combat Labs Information  
Helpline at 1-800-426-6228.

**FOR LARGE ROACHES,  
THEY CARRY FOR 3 MONTHS  
KILLS ROACHES & THE EGGS**



**THIS IS HOW COMBAT ROACH BAIT STATIONS WORK**



COMBAT® bait stations contain a totally unique insecticide ingredient to kill roaches. Laboratory and home use tests prove COMBAT® provides 3 months of effective roach control.

- EASY TO USE-NOTHING TO A...
- NO VAPOR, FUMES OR OD...
- CHILD-RESISTANT

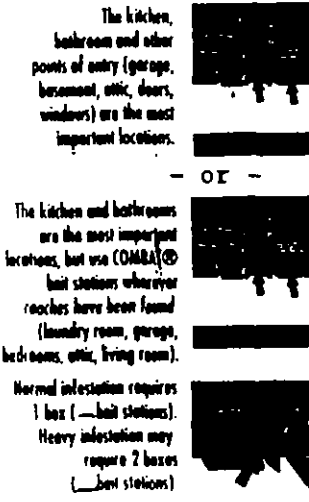
**DIRECTIONS FOR USE:**

(VEA INSTRUCCIONES EN ESPAÑOL EN LA CAJA)  
IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING

1. Break COMBAT® bait feeding stations apart from frame. You should use all 8, OR 12 bait stations at the same time for effective control.
  2. Place bait stations wherever roaches are seen-- near doors, windows and floor drains (refer to diagram for specific placement locations).
- OR
- COMBAT® bait stations can be placed anywhere you've seen roaches. Use at least 10 bait stations in the kitchen and 2 in each bathroom (under refrigerator and appliances, inside cabinets and drawers) Refer to diagram for other placement locations.
- Do not use sprays or foggers around bait stations. they can contaminate bait stations and reduce effectiveness. Bait stations work best on horizontal surfaces touching corners and next to walls. Use enclosed stickers for vertical surfaces.
3. Roaches will begin eating the bait immediately, and you can expect to see fewer roaches within two weeks
  4. Replace all bait stations after 3 months of use sooner if infestation is heavy. Use enclosed replacement reminder

**STORAGE AND DISPOSAL**  
STORAGE: Store in cool, dry area.  
DISPOSAL: Wrap used bait stations and put in trash

**PLACEMENT OF COMBAT® BAIT STATIONS**



**FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS:**

This product is specially designed for large roaches, waterbugs & palmetto bugs. Select the right COMBAT® Roach Killing System 1 for your roach problem by using the pictures below to identify which type of pest you have:



**Large, 1" to 1-1/2" Cockroach**  
Habits: Primarily live and breed outdoors and enter homes in search of food. For effective control, bait stations should be put in places where roaches can enter your home.



**Small, 1/2" Cockroach**  
Habits: Primarily live and breed in moist areas like kitchens and bathrooms. For effective control, bait stations should be placed wherever roaches have been seen in your home.

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 1 for effective roach control.

- Kills roaches faster than before.
- Faster acting formula.
- Contains *Aquatech* which is fresher and more appealing to roaches.

#### COPY B

Roaches enter the bait station and eat the bait.

#### COPY C

Roaches return to their nest and die.

#### COPY D

Other roaches eat them and die, creating a chain reaction.

#### COPY E

1. Open pouch and separate the bait stations from plastic frame. Do not remove or puncture the label on bait station.
2. For best results, use all 8 [or 12] bait stations at one time.
3. Place at least 6 [or 10] bait stations in the kitchen and 1 [or 2] in each bathroom (food storage and water sources are the most common roach areas). Specific placement areas include under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.
4. Place baits wherever you see roaches; severe roach problems may require 2 boxes or more. The more bait stations placed out, the more roaches find the bait. This means faster and more effective control of your roach problem.
5. Bait stations work best when touching walls or corners. Use enclosed stickers when placing them upside down. It is not necessary to use stickers on all baits.
6. Replace all \_\_\_ bait stations every 3 months, or sooner if they return, because roaches have probably eaten all of the bait. Use enclosed replacement reminder.

MAY 23 1995

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COPY F  
bait stations



1/2

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# COMBAT® Roach Killing System 1

**THIS SIDE DOWN:** This side should be placed against surface.  
*(Note: Do not remove or puncture this label.)*

**ACTIVE INGREDIENT:** Hydra... ethynon [tetrahydro-5, 5-dimethyl-2 (1H)-  
pyrimidinone (3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)phenyl]  
ethenyl]-2-propenylidene)hydrazone] ..... 1.0%

**INERT INGREDIENTS** ..... 99.0%

**CAUTION: DO NOT ALLOW CHILDREN OR PETS  
TO PLAY WITH THE BAIT STATION.**

**DISPOSAL:** Wrap used station and put in trash.  
For questions or comments about COMBAT, call toll free 1-800-  
426-6228.

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Combat Insect Control Systems  
1221 Broadway, Oakland, CA 94612 NET WT. \_\_\_\_\_  
EPA Reg. No. 64240-4 EPA Est. No. 5813-MS-01

**SEE OUTER CARTON FOR COMPLETE DIRECTIONS.**

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