

64240-4

2/2/2011

1 of 8



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

FEB - 2 2011

Ms. Georgia Anastasiou, Agent
Combat Inset Control Systems
c/o Henkel Consumer Goods Inc.
1900 N. Scottsdale Road
Scottsdale, AZ 85255

Subject: Label Notification(s) for Pesticide Registration PR Notice 2007-4

Dear Ms. Anastasiou:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 9, 2010 for:

EPA Registration Number: 64240-4 Combat Roach Killing System 1

The Registration Division (RD) has conducted a review of this request for applicability Under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our Records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Melody Banks on 703 305-5413.

Sincerely,

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

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7504P)

2008

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

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

Section - II

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

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

NOTIFICATION TO UPDATE STORAGE & DISPOSAL PER PR NOTICE 2007-4

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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	<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		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 Georgia Anastasiou - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 10
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 <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date August 9, 2010	

3048 (MS)

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

August 9, 2010

VIA COURIER

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard, Room S4900
2777 S. Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Mark Suarez
Product Manager, Team 11

SUBJECT: Combat Insect Control Systems
Notification per PR Notice 2007-4 for the following products
Combat Fire Ant Killer (EPA Reg. No. 64240-1)
Combat Ant Killing System (EPA Reg. No. 64240-3)
Combat Roach Killing System I (EPA Reg. No. 64240-4)
Combat Ant Control Formula System II (EPA Reg. No. 64240-5)
Combat Superbait Brand Granular Ant Killer (EPA Reg. No. 64240-25)
Combat Regular Roach Bait 0.5% HM (EPA Reg. No. 64240-27)
Combat Roach Gel (EPA Reg. No. 64240-35)

Dear Mr. Suarez:

On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

To support the notifications, enclosed please find the following documents for each product:

1. Application for Pesticide which includes the PR Notice 2007-4 certification;
2. One (1) copy of the label with changes highlighted; and,
3. Two (2) copies of the label.

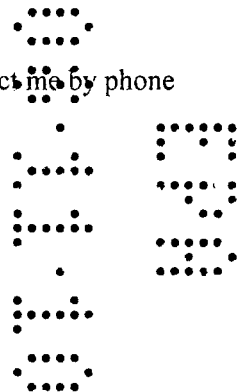
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat)



4028

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

Master Label, August 2010
EPA Reg. No. 64240-4
Combat Roach Killing System I

Pg 1 of 5

COMBAT® Roach Killing System 1

For Small Roaches

- or -

For Large Roaches
Waterbugs & Palmetto Bugs
Kills Asian Roaches

ACTIVE INGREDIENT: Hydramethylnon†.....1.0%

OTHER INGREDIENTS:99.0%

†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.

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.

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.

Distributed by & ©2010 Combat Insect Control Systems
19001 N. Scottsdale Rd. Scottsdale, AZ 85255
EPA Reg. No. 64240-4
EPA Est. No. _____

[TOTAL] NET WT. _____
Contains ____ CHILD-RESISTANT BAIT STATIONS
[U.S. Patent Nos. _____ and other patents pending.]
Combat GUARANTEED to work [or your money back]



[[The paperboard in this] [C]carton [contains] [is made from] _____%
Recycled fiber [minimum _____% post consumer content].]

The label may include illustrations of suggested bait station placement sites.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION

THIS IS HOW COMBAT[®] ROACH BAIT STATIONS WORK:

- or -

THIS IS HOW COMBAT STATIONS WORK:

1. Roaches enter the bait station and eat the bait. – or – Roaches enter the bait station.
2. Roaches return to their nest and die. – or – Roaches leave the bait station after eating bait inside.
3. Other roaches eat them and die, creating a chain reaction. – or – Behind your walls, roaches share bait with more – or – other roaches who also die.

The label may include illustrations of how the product works.

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 ½" 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, ½" 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.

COMBAT[®] stands behind this insect killing system with a full Satisfaction Guarantee.
[Should you have any questions regarding COMBAT[®], please call 1-800-426-6228]

[For more information, call the Combat[®] Labs Information Helpline at 1-800-426-6228. – or –
[For questions or comments, please call the Combat[®] Labs [Information] Helpline at 1-800-426-6228 [for more information].

[For questions or comments about COMBAT[®], call toll free 1-800-426-6228.]

Claims for Front or Back

- 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 activate
- No vapor, fumes or odor
- Child-resistant
- GUARANTEED TO WORK or your money back.
- Club item = institutional size economy pack

For Large Roaches:

- Controls your roach problem for 3 months
- A significant reduction in roaches will be apparent within 2 weeks
- Guaranteed to work or your money back
- Easy-to-use; nothing to activate. No vapors or fumes.
- Contains a totally unique insecticide ingredient to kill roaches
- Faster acting formula

For Small Roaches:

- Kills eggs
- Prevents roach reproduction
- Prevents egg hatching
- 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
- As The Domino Effect™ spreads through the roach population, roaches that area affected either die or lose their ability to produce eggs
- This product provides complete roach control
- Controls roaches two ways, by killing adults and preventing reproduction in others.
- This product disrupts the reproductive cycle of roaches.
- Depending on the amount of poison ingested, this product works by either killing or sterilizing the roaches.
- Kills roaches and eggs while you sleep
- Kills roaches and the eggs they carry for 3 months

7048

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
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Highlighted text is new!

Master Label, August 2010
EPA Reg. No. 64240-4
Combat Roach Killing System I

GENERAL PRECAUTIONS AND RESTRICTIONS
Do not remove or puncture the white label on bait station

APPLICATION INSTRUCTIONS

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 small – or – large 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 small – or – large 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.

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.

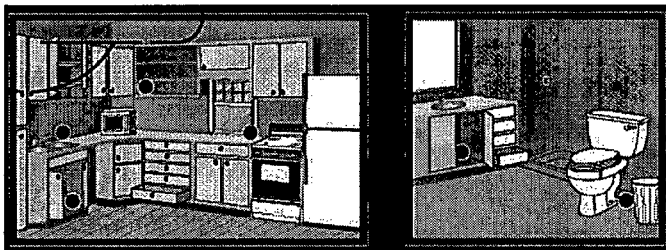
PLACEMENT OF COMBAT® BAIT STATIONS

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations.

- or -

The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).

Normal infestation requires 1 box (___ bait stations). Heavy infestation may require 2 boxes [or more] (___ bait stations).



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 waste agency for disposal instructions.

8078

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Pg 5 of 5

Master Label, August 2010
EPA Reg. No. 64240-4
Combat Roach Killing System I

Unit Label

COMBAT®

Roach Killing System 1

THIS SIDE DOWN OR AGAINST SURFACE.

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylnon†.....1.0%

OTHER INGREDIENTS:99.0%

†CAS No. 67485-29-4

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

CAUTION

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.

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.

[Should you have any questions regarding COMBAT®, please call 1-800-426-6228, -or-
[For questions or comments, please c] [C]all the COMBAT® Information Helpline at 1-800-426-6228 for more information.]]

Distributed by & ©2010 Combat Insect Control Systems
19001 N. Scottsdale Rd. Scottsdale, AZ 85255
EPA Reg. No. 64240-4
EPA Est. No. _____

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT. _____