

PM10

64240-32

5-8-97

1074

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY -8 1997

Stephen Smith
Registration Specialist
Combat Insect Control Systems
c/o PS & RC
P.O. Box 493
Pleasanton, CA 94566-0803

Dear Mr. Smith

Subject: Combat Gold
EPA Reg. No. 64240-32
Submissions dated 3/26/97 and 3/20/97

The labeling 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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

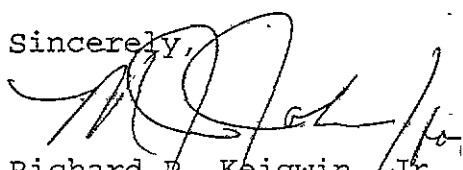
Delete the label claim "Faster than Before."

In the Directions for use, modify the last sentence in item 3 as follows:
[Roaches find the bait faster when 12 bait stations or baits are placed out].

You are reminded that claims that the product is "new" or "innovative" may only be used for six months following the date of registration.

If you have questions, please call Ann Sibold at 703 305-6502.

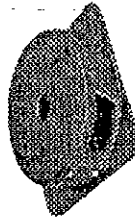
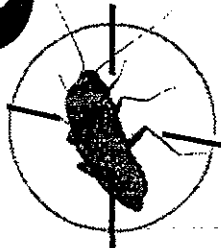
Sincerely,


Richard P. Keigwin, Jr.
Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (7505C)

CONCURRENCES

SYMBOL	PM team 10	7505C						
SURNAME	A. Sibold	M. John						
DATE	5/5/97	5/8/97						

COMBAT® GOLD



for front or back:

- Kills roaches overnight
- Kills roaches quickly
- New! Kills roaches in hours
- New! Kills roaches in minutes
- One roach can destroy the nest
- See visible results overnight
- Begin to see results overnight
- Visible results overnight
- Kills roaches continuously
- Continuous roach control
- Kills non-stop
- Long lasting power/control
- Kills roaches and eggs on killing
- Ongoing roach control
- Non-stop roach control
- Ongoing control/action
- 24 hour roach killing action
- Improved formula!!
- Effectively kills roaches without a trace -- no mess, no odor
- Child resistant bait stations
- Ideal for kitchen use
- Hands off way to get rid of roaches
- Lasts roaches kill roaches
- As significant reduction will be apparent within 3 days/5 days/1 week
- Starts killing roaches in hours
- You should see visible results overnight
- Significantly reduces visible roaches within 3 days/5 days/1 week
- Kills the roach nest
- Destroys the roach nest
- Kills the source of the roach problem
- Lasts roaches kill roaches
- Easy to use
- Easy to use, nothing to activate
- No vapors, no fumes, no mess
- Easy to use, no clean-up, [no odor]
- The clean way to kill roaches
- Guaranteed to kill roaches
- Guaranteed day and night roach control
- Long term control in just 3 days (guaranteed)
- Roach control in just 1-3 days
- Guaranteed to rid your home of roaches
- Guaranteed to protect your home from roaches
- Guaranteed to make a noticeable difference in your home
- Guaranteed to solve your roach problem
- Satisfaction - or Quality-Guaranteed
- Kills roaches where you can't find them
- Kills roaches - so you don't see them
- Kills two ways
- Dual killing action
- Dual kill formula
- Double action formula
- Kills roaches you don't see

or front or back:

- Kills roaches without mess, no fumes, no odor
- Kills roaches while you sleep
- Kills roaches 24 hours a day, 7 days a week

For Small Roaches

New! Overnight Action Formula
Kills Overnight and Keeps on Killing

ACTIVE INGREDIENT: Fipronil (5-Amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-(1,1,1-trifluoroethyl)-1H-pyrazole-3-carbonitrile) 0.05%
INERT INGREDIENTS: 99.95%

- Kills roaches you see and (even) those you don't see for complete protection
- Gets to the roach -- the source of the problem
- Wipes out the roach nest(s)
- Overnight results
- Overnight kill
- See dead roaches the next day
- See dead roaches overnight
- See [visible] results overnight
- Kills overnight
- See dead roaches in 24 hours
- See dead roaches in 1-3 days
- Powerful results in just 1-3 days
- See results within 1-3 days
- See [visible] results within - or - in 24 hours
- Same day kill
- Same day action - or - results
- 24 hour kill - or - action
- Fast acting - or - action formula
- Innovative, fast acting - or - action formula that quickly kills roaches
- Effective performance
- [Delivers] fast killing results

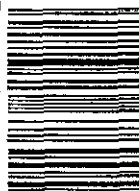
- Provides maximum roach control
- Kills roaches fast before they multiply for long-term control
- Long term control in just three days
- Continuous action for [around the clock] protection
- Works every minute of every hour of every day
- Works continuously, 24 hours a day [7 days a week]
- Works day after day, works day and night
- Provides long-term control
- Kills roaches before they become a problem
- Prevents re-infestation against roaches
- Keeps roaches out of sight
- Stops roaches before they become a problem
- Breaks the roach life cycle
- Protects - or - defends your home against roaches
- New!
- Patented action formula - or - ingredient
- Special formula
- New generation roach control
- Contains a totally unique insecticide ingredient to kill roaches

ACCEPTED
With COMMENTS
in EPA Letter Dated
MAY 8 1997

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, the pesticide registered under EPA Reg. No. 64240-32

CAUTION: DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS. TOTAL NET WT 0.42 oz (12 g.)

CONTAINS 12 BAIT STATIONS (for small roaches)



EPA Reg. No. 64240-32
EPA Est. No. 5813-MS-01
U.S. Patent Nos. _____ and other patents pending

(The registered name [in parentheses] is made from) _____ % (inert) _____ % (active ingredient)

© 1996 Combat Insect Control Systems
1221 Broadway, Oakland, CA 94612
MADE IN U.S.A.

R-10091-S (master)



COMBAT[®] GOLD

For Small Roaches

GUARANTEED TO WORK [or your money back!]**EFFECTIVENESS GUARANTEED:**

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

For Small Roaches

COMBAT[®] GOLD

THIS IS HOW COMBAT[®] GOLD WORKS:

- 1** Roaches enter the bait station and eat the bait.
- 2** Roaches return to their nest and die. ~~-or-~~ Roaches take the bait back to the nest.
- 3** Other roaches eat them and die, creating a chain reaction. ~~-or-~~ Roaches share the bait, killing other roaches and destroying the nest.



- COMBAT[®] BAIT STATIONS CONTAIN A TOTALLY UNIQUE INSECTICIDE INGREDIENT TO KILL ROACHES.
- EASY TO USE-NOTHING TO ACTIVATE
- NO VAPOR, FUMES OR ODOR



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

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

- Remove wrapper and separate bait stations from plastic frame ~~-or-~~ break baits apart. Do not remove or puncture the label on bait station. Now the baits are ready to use. Use all 12 baits at one time.
- Place baits wherever you see roaches [or signs of roaches]. [Some of the most likely locations ~~-or-~~ hiding places for roaches are shown in the diagram to the right.] TIP: For best results, place baits about 1 foot away from each other.
- [For best results, use all 12 bait stations at one time. ~~-or-~~ Put out all 12 baits.] [If you have fewer than 12 places where you have seen roaches, place the extra baits about 1 foot away from the other baits that you have just placed. Place any remaining baits in likely roach hiding places.] TIP: [Roaches find the bait faster when more bait stations ~~-or-~~ baits are placed out.]
- Use enclosed adhesive squares when placing baits on walls or upside down. It is not necessary to use stickers on all baits. TIP: Baits ~~-or-~~ [B] bait stations work best when touching walls or corners.
- Replace all 12 baits every 3 months, or sooner if roaches return because roaches have probably eaten all of the bait inside.

[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.]

STORAGE AND DISPOSAL

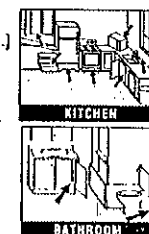
STORAGE: Store in cool, dry area out of reach of children.

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 12 bait stations at one time.]

Under/around sink	Kitchen:	Near doors
Under refrigerator	On counters	On floor/ in corners
Under stove	In cupboards/drawers	
	Near garbage cans	
Behind toilet	Bathroom:	
Under/around sink	Near shower/bathtub	On floor/ in corners
	Inside cabinets/ drawers	



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

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 12 bait stations.

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION

Wash thoroughly with soap and water after handling bait stations

This product is specially designed for small roaches.

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.



For Small Roaches

COMBAT[®] GOLD

The artwork is shown below at 200% of actual size.



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

ACTIVE INGREDIENT: Fipronil [5-Amino-
1-(2,6-dichloro-4-(trifluoromethyl)
phenyl)-4-(1,1,1-trifluoroethyl)
sulfinyl]-1H-pyrazole-3-carbonitrile] 0.05%
INERT INGREDIENTS: 99.95%

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

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

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

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1221 Broadway, Oakland, CA 94612

EPA Reg. No. 64240-32

NET WT 0.035 oz. (1 g.)

EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND ADDITIONAL PRECAUTIONARY STATEMENTS

RU-10091-2 (master)

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