



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 21 2009

Ms. Georgia Anastasiou
Lewis & Harrison, LLC
122 C St. NW #740
Washington, DC 20001

RE: Notification of Alternate Brand Names: **Combat Source Kill Max Roach Killing Bait**
Combat Platinum Brand Roach Killing Bait

EPA Registration Number: 64240-32
Date of Submission: April 6, 2009

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 6, 2009, for the product, Combat Gold. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 64240-32	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Gold	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15501 N. Scottsdale Road Scottsdale, AZ 85260 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <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. _____ NOTIFICATION _____ Product Name _____ MAY 21 2009 _____	

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 OF ALTERNATE BRAND NAMES:

Combat Source Kill Max Roach Killing Bait

Combat Platinum Brand Roach Killing Bait

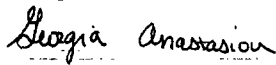
PLEASE READ COVER LETTER FOR DETAILS.

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the 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	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<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		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
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. 19
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 	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date April 6, 2009	

LEWIS & HARRISON

Consultants in Government Affairs

April 6, 2009

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

HAND DELIVERED

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

**ATTENTION: Richard Gebken
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems
Combat Gold (EPA Reg. No. 64240-32)
Notification per PR Notice 98-10: Alternate Brand Name**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), we are submitting a notification to propose the following alternate brand names for the product Combat Gold (EPA Reg. No. 64240-32):

**Combat Source Kill Max Roach Killing Bait
Combat Platinum Brand Roach Killing Bait**

Please note that Jim Roelofs from the OPP Labeling Committee stated the word "Max" is acceptable as part of the brand name. In addition, as noted in the attached EPA letter dated 11/21/06, the words "Platinum Brand" can be used as part of the alternate brand name.

In support of this submission enclosed please find an Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10 and one copy of the label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com. I thank you in advance for your cooperation.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

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

MASTER LABEL

COMBAT® GOLD

Alternate Brand Names

Current: [Combat 12 Month 1/

Proposed: [Combat Source Kill Max Roach Killing Bait/

Proposed: [Combat Platinum Brand Roach Killing Bait/

NOTIFICATION

MAY 21 2009

KILLS UP TO ONE YEAR

ACTIVE INGREDIENT: Fipronil†0.05%

OTHER INGREDIENTS:99.95%

†CAS No. 120068-37-3

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

CAUTION:

See precautionary statements on back – or – side panel.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Wash [hands] thoroughly with soap and water after handling bait stations.

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

DISPOSAL: If empty: Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

Distributed by & ©2009 Combat Insect Control Systems
19001 N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-32
EPA Est. No. _____

FOR SMALL ROACHES

TOTAL NET WT. 0.63 OZ (18g)

18 CHILD-RESISTANT BAIT STATIONS

Product is covered by one or more of the following: U.S. Patent Nos. 4,563,836; 4,990,514 and other patents pending.

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

HOW COMBAT® WORKS:

Roaches enter the bait station and eat the bait.

Roaches take the bait back to the nest

Roaches share the bait, killing other roaches and destroying the nest

Results may be affected by the number of roaches, the cleanliness of the area and the use of other roach control measures throughout the structure.

DIRECTIONS FOR USE

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

1. **Use all 18 baits.** Break baits apart. Place all baits where roaches are found as shown in the diagram(s). [Use enclosed stickers as needed.]
2. **Do not use sprays around baits.** Sprays contaminate baits and reduce effectiveness.
3. **Replace all 18 baits every 12 months** or sooner if roaches return.

GUARANTEED to work or your money back! Call the COMBAT® Labs Helpline at 1-800-426-6228 For Information. [Questions? Comments? Call 1-800-426-6228]



[Please Recycle Empty Carton.]

[The paperboard in this carton contains 100% recycled fiber [minimum 35% post consumer content].]

- Kills non-stop for up to 12 months
- Kills in hours
- No vapor, fumes, or odor
- [COMBAT® 12 MONTH]
- Better bait formula [for improved control]*
- Increased feeding [for improved control]*
- With foods roaches prefer
- New [bait] [formula]*
- Improved [bait] [formula]*
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]

*vs. previous formula



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SUBLABEL A: UNIT LABEL
Actual size of unit label is approximately 2.125 in. x 2.125 in.

COMBAT® GOLD

NOTIFICATION

MAY 21 2009

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Fipronil†0.05%

OTHER INGREDIENTS:99.95%

†CAS No. 120068-37-3

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

CAUTION:

[Wash [hands] thoroughly with soap and water after handling bait stations.]

DISPOSAL: If empty: Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

[Questions or Comments? Call 1-800-426-6228]

Distributed by & ©2009 Combat Insect Control Systems
19001 N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-32
EPA Est. No. _____

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT. 0.035 oz (1g)

