

64240-32

11/2/2009

1 of 7



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**November 2, 2009**

**Mr. Robert S. Brennis**  
**Agent for Combat Insect Control Systems**  
**Lewis & Harrison**  
**122 C St. NW, Suite 740**  
**Washington, DC 20001**

**Subject:** Label Amendment Label Amendment—revision of marketing claims, use directions, and PR Notice 2007-4

**Product Name:** COMBAT® GOLD

**EPA Reg. No.:** 64240-32

**Application Dated:** August 3, 2009

**Decision Number:** 418472

Dear Mr. Brennis:

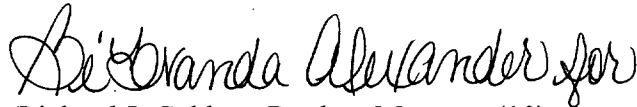
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following label revision provisions:

1. Delete the alternate brand name "Combat Source Kill Max Roach Killing Bait." Wording such as "kill max", "max kill", or "source kill max" are false and misleading efficacy/marketing claims. Also, delete any references to "quick kill," as this is an implied efficacy claim for insect knockdown, which is not appropriate for a bait product. These changes must be applied on page 1, page 5, and anywhere else on the label that makes reference to the brand name or the aforementioned claims.
2. On page 2, revise the hazard to humans and domestic animals statement to read as follows: "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet."
3. On page 2 and page 5, delete the brackets around the storage and disposal statement "do no contaminate water, food, or feed by storage or disposal". This language is mandatory and must not be bracketed as optional language.
4. On page 2, revise the beginning of the warranty statement to read as follows: "To the extent consistent with applicable law, COMBAT® [Insect Control Systems] stands behind . . . ."
5. On page 3, revise the typographical error ("eat the belt") to read "Roaches enter the bait station and eat the bait."
6. On page 4, delete the claim "Advanced [food] formula\*\*", as this is an undefined/misleading claim.

A copy of the label stamped "accepted with comments" is enclosed for your records.

You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Clayton Myers at (703) 347-8874 or [myers.clayton@epa.gov](mailto:myers.clayton@epa.gov).

Sincerely,



Richard J. Gebken, Product Manager (10)  
Registration Division, Insecticide Branch

Enclosure

3007

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

Master Label, JULY, 2009  
EPA Reg. No. 64240-32  
Combat Gold  
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**COMBAT® GOLD**

*Alternate Brand Names:*

**Combat 12 Month 1**

**Combat Source Kill Max Roach Killing Bait**

**Combat Platinum<sup>Brand</sup> Roach Killing Bait**

KILLS UP TO ONE YEAR  
WORKS UP TO 12 MONTHS

[ROACH]

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 [full] [complete] precautionary statements on [back] [side] panel.

EPA Reg. No. 64240-32      EPA Est. No. \_\_\_\_\_

Distributed by & ©2009 Combat Insect Control Systems  
[19001 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85255  
[MADE IN U.S.A.]

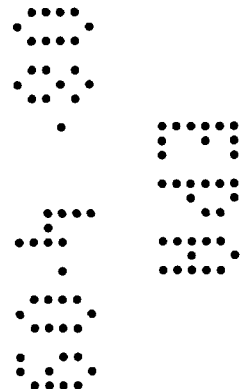
FOR SMALL ROACHES

[CONTAINS] [6] [12] [18]

Child-resistant bait stations [for small roaches]

[TOTAL] NET WT [0.21 oz (6 g)] [0.42 oz (12 g)] [0.64 oz (18g)]

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated  
NOV - 2 2009  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
64240-32



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[Bracketed information is optional text]

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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

**STORAGE AND DISPOSAL:** [Do not contaminate water, food or feed by storage or 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 water agency [or [toll free number] **1-800-CLEANUP**] for disposal instructions. Never place unused product down any indoor or outdoor drain.

[U.S. Patent Nos. \_\_\_\_\_ and others pending.]

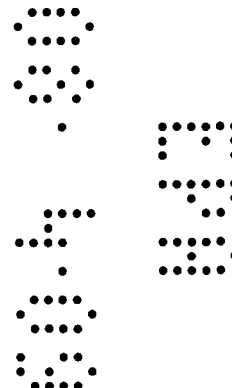
[Combat®] [Guaranteed to work [or your money back]!

[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.]

*{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.}*



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Note: *Bold, Italicized text is information for the reader and is not part of the label.*  
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*The label may include illustrations of roaches and suggested bait station placement sites.*

[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] WORKS:

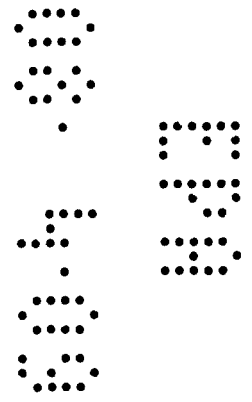
- Roaches enter the bait station and eat the bait.
- Roaches take the bait back to the nest
- Roaches share the bait, killing other roaches and destroying the nest

[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.

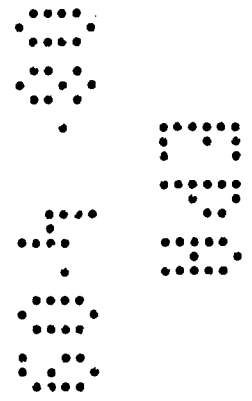
1. Use all [6] [12] [18] baits. Break baits apart. Place all baits where roaches are found as shown in the diagram[s] to the [right] [[left] [above] [below.] [Use enclosed stickers as needed.]
2. Do not use sprays around baits. Sprays contaminate baits and reduce effectiveness.
3. Replace all [6] [12] [18] baits every 12 months or sooner if roaches return.



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***Claims for front or back***

- Kills up to one year
- Works up to 12 months
- [Roach]
- Kills non-stop for up to 12 months
- Kills in hours
- No vapor, fumes, or odor
  
- Easy to use
- Nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor
  
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- With foods roaches prefer
  
- New [bait] [formula]\*      *{“new” to be used for only 6 months from initial distribution}*
  
- Better bait formula [for improved control]\*      \*vs. previous [bait] formula
- Increased feeding [for improved control]\*      \*vs. previous [bait] formula
- Improved [bait] [formula]\*      \*vs. previous [bait] formula
  
- Increased feeding [for improved control]\*      \*vs. previous [bait] formula
- Advanced [food] formula\*      \*vs. previous [bait] formula



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Master Label, JULY, 2009  
EPA Reg. No. 64240-32  
Combat Gold  
Pg 5 of 5

**BAIT STATION UNIT LABEL**

*Actual size of unit label is approximately 2.125 in. x 2.125 in.*

**COMBAT® GOLD**

*Alternate Brand Names:*

**Combat 12 Month 1**

**Combat Source Kill Max Roach Killing Bait**

**Combat Platinum<sup>Brand</sup> Roach Killing Bait**

ACTIVE INGREDIENT: Fipronil<sup>†</sup>.....0.05%

OTHER INGREDIENTS: .....99.95%

<sup>†</sup> 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.

**STORAGE AND DISPOSAL:** [Do not contaminate water, food or feed by storage or 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 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]

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[19001] N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-32 EPA Est. No. \_\_\_\_\_

SEE OUTER [CARTON] [BAG] FOR [FULL] [COMPLETE] DIRECTIONS AND PRECAUTIONS

NET WT. 0.035 oz (1g)

