

64240-32

1/6/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

January 6, 2010

Ms. Georgia Anastasiou
Agent for Combat Insect Control Systems
Lewis & Harrison
122 C St. NW, Suite 740
Washington, DC 20001

Subject: Label Amendment—addition of beehive statement to labels produced after July 1, 2010
Product Name: COMBAT® GOLD
EPA Reg. No.: 64240-32
Application Dated: January 4, 2010
Decision Number: 425648

Dear Ms. Anastasiou:

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. In the Directions for Use, add the following statement to all labels produced after July 1, 2010, per the agreement reached with the Agency via email correspondence on January 4, 2010: "Do not use in beehives."

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.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Gebken".

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

Enclosure

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

COMBAT[®] GOLD

Alternate Brand Names:

Combat 12 Month 1

Combat Source Kill Max Roach Killing Bait

Combat Platinum^{Brand} 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
JAN - 6 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
64240 - 32

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

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: To the extent consistent with applicable law, 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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Master Label, December 10, 2009
EPA Reg. No. 64240-32
Combat Gold
Pg 3 of 5

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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Master Label, December 10, 2009
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Combat Gold
Pg 4 of 5

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

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BAIT STATION UNIT LABEL

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

COMBAT® GOLD

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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.

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)