

64240-32

07/09/2012

1/8



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms Georgia Anastasiou  
Agent for Combat Insect Systems  
Lewis & Harrison  
122 C Street N W Suite 740  
Washington DC 20001

JUL - 9 2012

Subject Label Notification(s) for Pesticide Registration Notice 98 10

Dear Ms Anastasiou

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 dated June 26 2012 for the following product(s)

**Combat Max 12 Month                      Alternate Brand Name**

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98 10 and finds that the label change(s) requested falls within the scope of PRN 98 10 The label has been date stamped Notification and will be placed in our records

**Combat<sup>o</sup> Gold                      EPA Reg No 64240 32**

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely

f Richard J Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7504P)

Please read instructions on reverse before completing form

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

	United States <b>Environmental Protection Agency</b> 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 <b>64240 32</b>	2 EPA Product Manager <b>Richard Gebken</b>	3 Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) <b>Combat Gold</b>	PM# <b>10</b>	
5 Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> <b>c/o Henkel Consumer Goods Inc</b> <b>19001 N Scottsdale Rd</b> <b>Scottsdale AZ 85255</b> <i>NOTE PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW</i> <input type="checkbox"/> Check if this is a new address		6 <b>Expedited Review</b> 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 of the Alternate Brand Name Combat Max 12 Month**

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  <i>*Certification must be submitted</i>	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)
	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 <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b> <b>122 C St NW #740 Washington DC 20001</b>		Title <b>Agent for Combat Insect Control Systems</b>	Telephone No (include Area Code) <b>202 393 3903 ext 19</b>
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 <b>(Stamped)</b>
2 Signature <i>Georgia Anastasiou</i>		3 Title <b>Agent for Combat Insect Control System</b>	
4 Typed Name <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b>		5 Date <b>June 26 2012</b>	

# LEWIS & HARRISON

122 C Street N W Suite 740  
Washington D C 20001  
telephone 202 393 3903  
fax 202 393 3906

Consultants in Government Affairs

June 26 2012

**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

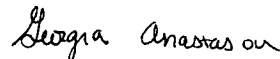
On behalf of Combat Insect Control Systems I submitting a notification to propose the following alternate brand name for the product Combat Gold (EPA Reg No 64240 32)

**Combat Max 12 Month**

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 a copy of the master label with the proposed brand name

If you have any questions please contact me at 202 393 3903 ext 19 or by email at georgia@lewisharrison com

Sincerely



Georgia Anastasiou  
Agent for  
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

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

Master Label June 26 2012  
EPA Reg No 64240 32  
Combat Gold  
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**COMBAT® GOLD**

*Approved Alternate Brand Names*

**[Combat 12 Month 1]**

**[Combat Source Kill Max Roach Killing Bait]**

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

*Proposed Alternate Brand Name*

**[Combat Max 12-Month]**

KILLS UP TO ONE YEAR

WORKS UP TO 12 MONTHS

[ROACH]

ACTIVE INGREDIENT Fipronil <sup>†</sup>	0 05%
OTHER INGREDIENTS	99 95%
TOTAL	100 00%

<sup>†</sup> 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 & ©2011 Combat Insect Control Systems  
[19001 N Scottsdale Rd ] Scottsdale AZ [ARIZONA] 85255  
[MADE IN [U S A ] [KOREA]]

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)]

**NOTIFICATION**  
**JUL - 9 2012**

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[Bracketed information is optional text]

**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 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 }*

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

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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 ] Do not use in beehives
- 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

***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

Note *Bold, Italicized text is information for the reader and is not part of the label*  
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**BAIT STATION UNIT LABEL**

*Actual size of unit label is approximately 2 125 in x 2 125 in*

**COMBAT<sup>®</sup> GOLD**  
**[Combat 12 Month 1]**  
**[Combat Source Kill Max Roach Killing Bait]**  
**[Combat Platinum<sup>Brand</sup> Roach Killing Bait]**  
*Proposed Alternate Brand Name*  
**[Combat Max 12 Month]**

ACTIVE INGREDIENT Fipronil <sup>†</sup>	0 05%
OTHER INGREDIENTS	99 95%
TOTAL	100 00%

<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 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)