

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 5, 2013

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

Subject:

Notification for Minor label Change

EPA Registration Number: 64240-32

Decision: 471009

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated September 18, 2012, for the abovementioned product. 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 regarding this letter, please contact Driss Benmhend at (703) 308-9525.

Sincerely,

Richard J. Gebken Product Manager (10)

Insecticide Branch

Registration Division (7504P)

Enclosures: Copy of Label Stamped "Notification"

**OPP Identifier Number** 

	Form	Approveà;	OMB No	. 2070-006	0, Approva	l expires	05-31-9	8
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**United States** 

☐ Registration	1
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Washington, DC 20460						
	Applic	ation for Pe	esticide - Sectio	n I		
Company/Product Number			Product Manager	· · · · · · · · · · · · · · · · · · ·	3. Proposed Classification	
64240-32		Richar	d Gebken		None Restricted	
4. Company/Product (Name)		PM#	<del> </del>		None Restricted	
Combat Gold		10				
5. Name and Address of Applicant (Incombat Insect Control System			6. Expedited Review. In accordance with FIFRA Section 3(c)(3)			
c/o Henkel Consumer Goods Inc		(D)(I), n   to:	(b)(l), my product is similar or identical in composition and labeling			
19001 N. Scottsdale Rd.	•	1	Reg. No			
Scottsdale, AZ 85255			keg. No			
NOTE: PLEASE SEND ALL CORR "CONTACT POINT" LISTED BEL		Produc	ct Name			
Check if this is a new ac						
Cricon ii una la a riew de	iur 033			<i>:</i>		
		Section	on - II			
Amendment - Explain below.				• •	Agency letter dated	
Resubmission in response to A	gency letter dated		"Me Too" Applie		·	
Notification - Explain below.	nage(a) if nagence	Tor Cost	Other - Explain			
Explanation: Use additional	page(s) if necessa on to make minor	•		-	ar dotaile	
Notification in Accordance With PR						
other changes have been made to the	labeling or the confident	ial statement of for	rmula of this product. I u	inderstand that it is a	violation of 18 U.S.C. Sec 1001 to	
willfully make any false statement to						
product may 55 m visit	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					
Material This Product Will Be Pace	ckaged In:		· · · · · · · · · · · · · · · · · · ·			
Child-Resistant Packaging	Unit Packaging		Water Soluble Page	ckaging	2. Type of Container	
Yes*	☐ Yes		Yes		Metal	
☐ No	☐ No		☐ No		Plastic	
	If "Yes"	No. per t. container	If "Yes" Package wgt.	No. per container	Glass	
*Certification must	Unit Packaging wgt	Container	Package wgt.	Container	Paper	
be submitted	L <u></u>				Other (Specify)	
3. Location of Net Contents Informat	1	(s) Retail Contain	ner		of Label Directions	
Label Container				On Labe		
6. Manner in Which Label is Affixed	to Product  Lit	hograph	Other	On label	ng accompanying product	
Paper glued			00			
	St	enciled				
		Section	on – IV			
1. Contact Point (Complete items die	ectly below for identific	ation of individua	I to be contacted, if ne	cessary, to proces	s this application)	
Name Georgia Anastasiou - Lewis & Harrison, LLC, 122 C St. NW #505, Washington DC 20001 Title Agent for Combat Insect Control Systems Telephone No. (Include Area Code) 202-393-3903 ext. 19						
Certification 6. Date Application						
acknowledge that any knowledgy false or misleading statement may be punishable by fine or imprisonment or both			Received (Stamped)			
under applicable law.						
		3. Title		· ·	, , ,	
Leogia anavasion	ļ	Agent for	Combat Insect Co	ntrol System ·		
4 Tuesd Name						
Typed Name     Georgia Anastasiou - Lewis & Harrison, LLC		J. Date	September 18, 20	12	(	

# LEWIS & HARRISON

122 C Street, N.W., Suite 505 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393.3906

Consultants in Government Affairs

September 18, 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

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product Combat Gold (EPA Reg. No. 64240-32). The purpose of this notification is to make minor revisions to the label. The revisions include addition of non-FIFRA language, clarifying which language is considered optional, addition of graphics, and adding cautionary language to the bait station label.

In support of this submission enclosed please find the following documents:

- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted;
- 3) Two (2) copies of the revised label; and,
- 4) PDF copy of the revised label.

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

Sincerely,

Leogia anavasion

Georgia Anastasiou

Agent for Combat Insect Control Systems

cc: Patricia McFadden (Combat Insect Control Systems)

#### COMBAT® GOLD

Approved Alternate Brand Names:

[Combat 12 Month 1]

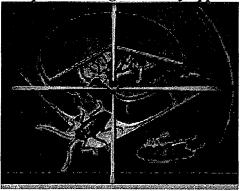
[Combat Source Kill Max Roach Killing Bait]

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

[Combat Max 12-Month]

[Combat Max 12-Month Roach Killing Bait]

Note to reviewer: Optional image that may appear on front panel



NOTIFICATION

[KILLS UP TO ONE YEAR]
[WORKS UP TO 12 MONTHS]

FEB 0 5 2013

#### [ROACH]

ACTIVE INGREDIENT: Fipronil <sup>†</sup>	0.05%
OTHER INGREDIENTS:	
TOTAL:	
† 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. \_\_\_\_\_

[FOR] SMALL ROACH[ES].

[CONTAINS] [6] [12] [18] Child-resistant bait stations [for] [small reaches] [TOTAL] NET WT [0.21 oz (6 g)] [0.42 oz (12 g)] [0.64 oz (18g)]

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems [19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255

MADE IN [USA][KOREA]

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

Pg 2 of 5

#### 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.
[U.S. Patent Nos.	and others	; penaing.

[Combat<sup>®</sup>] [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<sup>®</sup> [Labs] [Information] Helpline at 1-800-426-6228 [for information]. -or- [For questions or comments, [please] call the Combat<sup>®</sup> [Labs] [Information] Helpline at 1-800-426-6228 [for information]].

Optional Henkel statement for front or back or side panel:



[[The paperboard in this] [C]carton [contains] [is made from]	_% Recycled fiber [minimum
% post consumer content]] [Please Recycle Empty Carton.]	

The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.}

#### [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

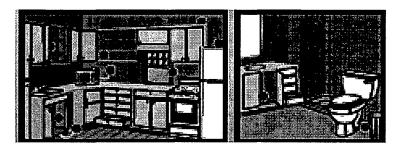
[Results may be affected by the number of roaches, the cleanliness of the area and the use of other roach control measures throughout the structure]

#### **DIRECTIONS FOR USE**

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

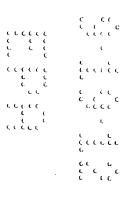
- 1. Use all [6] [12] [18] baits. Break baits apart. Place all baits where roaches are found as shown in the diagram[s][ to the [right] [left] [above] [below.]] [Use enclosed stickers as needed.] Do not use in beehives.
- 2. Do not use sprays around baits. Sprays contaminate baits and reduce effectiveness.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

Note to reviewer: Label may include these graphic depictions of recommended placement locations.



Note to reviewer: Label may include the following optional image





#### 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]\*
- Increased feeding [for improved control]\*
- Improved [bait] [formula]\*.
- Increased feeding [for improved control]\*

- \*vs. previous [bait] formula

Master Label, September 17, 2012 EPA Reg. No. 64240-32 Combat Gold Pg 5 of 5 8/8

#### **BAIT STATION UNIT LABEL**

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

### COMBAT® GOLD

[Combat 12 Month 1]
[Combat Source Kill Max Roach Killing Bait]
[Combat Platinum<sup>Brand</sup> Roach Killing Bait]
[Combat Max 12-Month]
[Combat Max 12-Month Roach Killing Bait]

THIS SIDE DOWN OR AGAINST SURFACE Note: Do not remove or puncture this label

<b>ACTIVE INGREDIENT: Fipron</b>	il <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]

Distributed by & ©2011 Combat Insect Control Systems
[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

EPA Reg. No. 64240-32	EPA Est. No.
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SEE OUTER [CARTON] [BAG] FOR [FULL] [COMPLETE] DIRECTIONS AND PRECAUTIONS

NET WT. 0.035 oz (1g)