6/19/2013



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

JUN 1 9 2013

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

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 10, 2013 for the following product(s):

Combat Gold Reg. No. 64240-32

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.

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

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Sincerely,

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

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Please read instructions on reverse before completing form. United States			Form Approv		70-0060, Approval expires 05-31-98 OPP Identifier Number		
EPA Environmental Protection Washington, DC 2046				dment			
			Other				
1. Company/Deaduct Number	Аррисано		esticide - Sectio		2 Droposed Classification		
1. Company/Product Number 64240-32			d Gebken	3. Proposed Classification			
4. Company/Product (Name) Combat Gold							
 5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001 			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. NoJUN 1 9 2013				
Check if this is a new ad	ddress	Produ	ct Name		1414		
	<u> </u>		on - II				
Amendment - Explain below.			······	bels in response to	Agency letter dated		
Resubmission in response to A	gency letter dated		Me Too" Applic				
Notification - Explain below.	· ·		Other - Explain				
Notification in Accordance With PR other changes have been made to th willfully make any false statement to	on to make minor cha Notice 98-10 This notification e labeling or the confidential sta	nges to l is consistent atement of fo if this notifie	abel. Please read with the provisions of PR rmula of this product. I u cation is not consistent wi	cover letter for Notice 98-10 EPA r nderstand that it is a ith the terms of PR N	egulations at 40 CFR 152.46, and no violation of 18 U.S.C. Sec 1001 to lotice 95-2 and 40 CFR 152.46, this		
			on – III				
1. Material This Product Will Be Pa							
Child-Resistant Packaging	Unit Packaging		Water Soluble Pac	kaging	2. Type of Container		
L_ Yes*							
No No	If "Yes"	No	If "Yes"				
	Unit Packaging wgt.	No. per container	Package wgt.	No. per container	Glass		
*Certification must					Paper		
be submitted				Other (Specify)			
3. Location of Net Contents Information 4. Size(s) Ref Label Container			ner	On Labe			
6. Manner in Which Label is Affixed	to Product Lithogra	aph	[] Other		ng accompanying product		
	Paper g Stencile	glued			 ۲۰۵۰۶۲۵ ۲۰۵۰۶۲۵ ۲۰۵۰۶۲۵		
		Sectio	on – IV		(ζ C C C		
1. Contact Point (Complete items di	rectly below for identification	of individua	I to be contacted, if neo	cessary, to provess	othis application)		
Name Georgia Anastasiou - Lewis &	& Harrison, LLC Title	Agent for	Combat Insect Contro	ا Systems ا با	elenhone No. (Include Area Code) 202-393-3903 ext. 19		
I certify that the statements I have n acknowledge that any knowingly fals under applicable law.	se or misleading statement n	ichments th nay be punis	ereto are true, accurate shable by fine or imprise	and complete. ال onment or both	[6. DateAnplication [. Received _ { (Stamped)		
2. Signature	Title	Combat Insect Car	((
Geogra anavasion			Combat Insect Con	iuoi system			
4. Typed Name 5. Da Georgia Anastasiou - Lewis & Harrison, LLC			June 10, 2013				
EPA Form 8570-1 (Rev. 8-94) Previou	s editions are obsolete		Whit	te- EPA File Copy	(original) Yellow- Applicant Co		

White- EPA File Copy (original) Yellow- Applicant Cop

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 June 10, 2013

HAND DELIVERED

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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 the following changes to the label:

- 1. Add the marketing language "[Destroys] [kills] the nest" and "Kills fast". Please note both claims are a reiteration of claims that are currently approved.
- 2. Remove the marketing language "New".

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

- a) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- b) One (1) copy of the label with changes highlighted; and,
- c) **(1**) copies 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, Luzzia anavasion

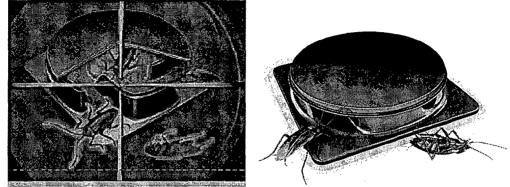
Georgia Anastasiou Agent for Combat Insect Control Systems

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 10, 2013 EPA Reg. No. 64240-32 Combat Gold Pg 1 of 5

COMBAT[®] GOLD Approved Alternate Brand Names: [Combat 12 Month 1] [Combat Source Kill Max Roach Killing Bait] [Combat Platinum^{Brand} 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



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

[ROACH]

NOTIFICATION

JUN 1 9 2013

[†] 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 roaches]

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

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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 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]].

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.]

{<u>Note to Reviewer</u>: 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

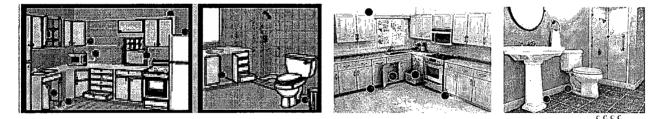
[Results may be affected by the number of roaches, the cleanliness of the area and the use of other roach control measures throughout the structure]

DIRECTIONS FOR USE

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

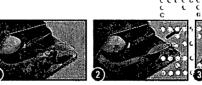
- 1. Use all [6] [12] [18] baits. Break baits apart. Place all baits where roaches are found as shown in the diagram[s][to the [right] [left] [above] [below.]] [Use enclosed stickers as needed.] Do not use in beehives.
- 2. Do not use sprays around baits. Sprays contaminate baits and reduce effectiveness.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





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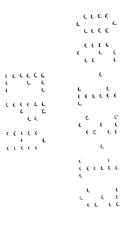
Claims for front or back

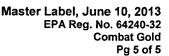
- Kills up to one year
- Works up to 12 months
- [Roach]

t

- Kills non-stop for up to 12 months
- Kills in hours
- [Destroys] [kills] the nest
- Kills fast
- 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
- •
- Better bait formula [for improved control]*
- Increased feeding [for improved control]*
- Improved [bait] [formula]*
- Increased feeding [for improved control]*

- *vs. previous [bait] formula *vs. previous [bait] formula
- *vs. previous [bait] formula
- *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 [Combat 12 Month 1] [Combat Source Kill Max Roach Killing Bait] [Combat Platinum^{Brand} 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

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 o	or information	about COMB	AT, call to	ll free 1-800-	426-6228]
[Questions or C	Comments?	Call 1-800-42	6-6228]			

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. _____

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

NET WT. 0.035 oz (1g)