

64240-32

12/3/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 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

DEC - 3 2013

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 October 25, 2013 for the following product(s):

Combat Gold **EPA Reg. No. 64240-32**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 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.

Sincerely,


A handwritten signature in black ink, appearing to read "Richard J. Gebken".

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

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Please read instructions on reverse before completing form.

Form Approved, OMB no. 2070-0060, Approval expires 05-31-98

 EPA United States Environmental Protection Agency 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 64240-32	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Gold	PM# 10	
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 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: <div style="text-align: center; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ <div style="text-align: center; font-size: 1.5em; font-weight: bold;">DEC - 3 2013</div> 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.)

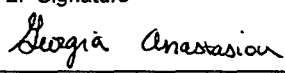
Notification to fix a typographical error. Please read cover letter for details.

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	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
*Certification must be submitted					
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 Georgia Anastasiou - Lewis & Harrison, LLC	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 19
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 <div style="text-align: center; font-weight: bold; font-size: 1.2em;">(Stamped)</div>
2. Signature 	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date <div style="text-align: center; font-weight: bold;">October 25, 2013</div>	

3 7 8

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

October 25, 2013

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 fix a typographical error in the Storage and Disposal section. Specifically in the "If partially filled" subsection I changed the word "water" to "waste".

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) ~~Two~~ (1) 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,

Georgia Anastasiou

Georgia Anastasiou
Agent for 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]

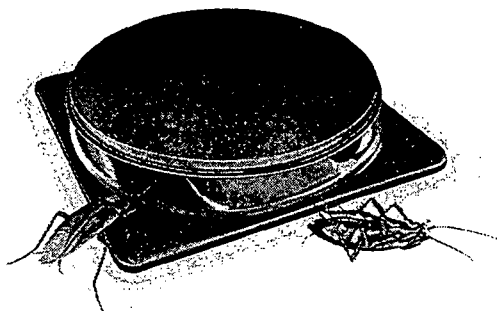
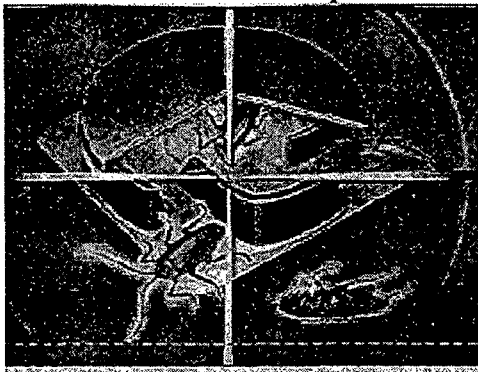
Master Label, October 25, 2013
EPA Reg. No. 64240-32
Combat Gold
Pg 1 of 5

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]

NOTIFICATION

[ROACH]

DEC - 3 2013

ACTIVE INGREDIENT: Fipronil[†] 0.05%
OTHER INGREDIENTS: 99.95%
 TOTAL: 100.00%

[†] 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 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]

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 waste 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.]

{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.

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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]

[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

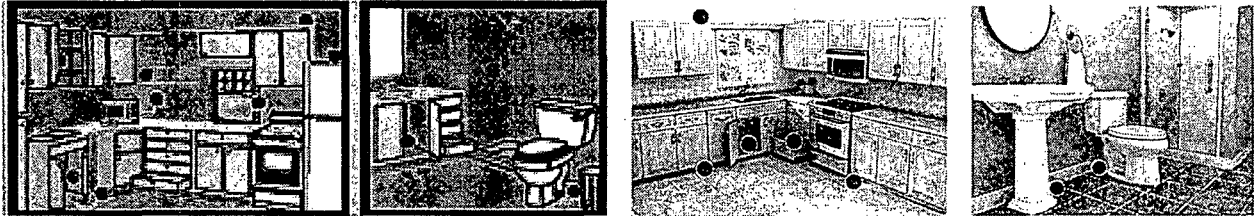
[Results may be affected by the number of roaches, the cleanliness of the area and the use of other roach control measures throughout the structure]

DIRECTIONS FOR USE

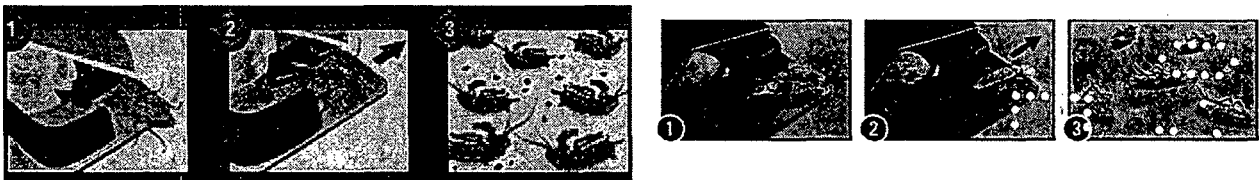
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

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

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
- [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

8 7 9

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

Master Label, October 25, 2013

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

[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

ACTIVE INGREDIENT: Fipronil[†] 0.05%

OTHER INGREDIENTS: 99.95%

TOTAL:.....100.00%

[†] 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 waste 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. _____

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

NET WT. 0.035 oz (1g)