

PM10

64240-33

5-8-97

174

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 8 1997

Stephen Smith
Registration Specialist
Combat Insect Control Systems
c/o PS & RC
P.O. Box 493
Pleasanton, CA 94566-0803

Dear Mr. Smith

Subject: Combat Small Roach Bait F.03
EPA Reg. No. 64240-33
Submissions dated 3/26/97 and 3/20/97

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Delete all label claims "Faster than Before."

In the Directions for use, modify the last sentence in item 3 as follows:

[Roaches find the bait faster when 12 bait stations or baits are placed out].

Delete the label claims relating to destroying/killing eggs.

You are reminded that claims that the product is "new" or "innovative" may only be used for six months following the date of registration.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



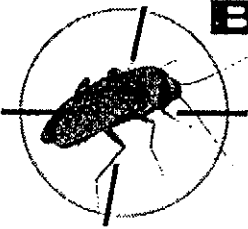
Marion Johnson
Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (7505C)

CONCURRENCES

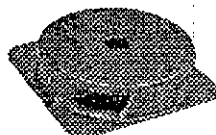
SYMBOL	PM10						
SURNAME	a. Sibold						
DATE	5/6/97						

COMBAT[®]

SMALL ROACH BAIT F.03



for your
money
back



For Small Roaches

New! Overnight Action Formula
Kills Overnight and Keeps on Killing

- for front or back:*
- Kills roaches without insecticide odors - or - fumes
 - Kills roaches
 - Destroys the nest and eggs
 - Kills roaches and the eggs they carry 24 hours a day, 7 days a week
 - Kills roaches while you sleep

ACTIVE INGREDIENT: Fipronil (5-Amino-1-(2,6-dichloro-4-(trifluoromethyl)phenyl)-4-(1,4,5)-(trifluoromethyl)sulfinyl)-1H-pyrazolo-3-carbonitrile) 0.03%

INERT INGREDIENTS: 99.97%

for front or back:

- Kills roaches overnight
- Kills roaches quickly
- (New) Kills roaches in hours
- (New) overnight action formula
- See visible results overnight
- Begin to see results overnight
- Visible results overnight
- Kills overnight and keeps on killing
- Starts killing within a day
- (New) quick kill formula
- (New) fast action formula
- (New) kills roaches within a day
- (New) one-day action
- A significant reduction will be apparent within 3 days/5 days/1 week
- Starts killing roaches in hours
- You should see visible results overnight
- Significantly reduces visible roaches within 3 days/5 days/1 week
- Kills the roach nest
- Destroys the roach nest
- Kills the source of the roach problem
- Lets roaches kill roaches
- Kills roaches in the nest
- Kills roaches where they hide/breed/live
- Kills roaches at the source
- Lets one roach destroy the nest
- One roach can destroy the nest
- Gets to the source of the roach problem
- New nest killing formula
- Kills roaches continuously
- Continuous roach control
- Kills non-stop
- Long lasting power/control
- Kills roaches and keeps on killing
- Ongoing roach control
- Non-stop roach control
- Ongoing control/action
- 24 hour roach killing action
- Improved formula!!
- Effectively kills roaches without a trace -- no fumes, no mess, no odor
- Child resistant bait stations
- Ideal for kitchen use
- Handy oil way to get rid of roaches
- Easy to use
- Easy to use, nothing to activate
- No vapors, no fumes, no - or - or mess
- Easy to use, no cleanup, no odor
- The clean way to kill roaches
- Guaranteed to kill roaches
- Guaranteed day and night roach control
- Long term control in just 3 days (guaranteed)
- Roach control in just 11-31 days
- Guaranteed to rid your home of roaches
- Guaranteed to protect your home from roaches
- Guaranteed to make a noticeable difference in your home
- Guaranteed to solve your roach problem
- Satisfaction - or - Quality Guaranteed
- Kills roaches where you can't find them
- Kills roaches - so you don't see them
- Kills two ways
- Fast killing action
- Fast kill formula
- Double action formula
- Kills roaches you don't see
- Kills roaches you see and (even) those you don't for complete protection
- Gets to the nest(s) - the source of the problem
- Wipes out the roach nest(s)
- Overnight results
- Overnight kill
- See dead roaches the next day
- See dead roaches overnight
- See (visible) results overnight
- Kills overnight
- See dead roaches in 24 hours
- See dead roaches in 11-31 days
- Powerful results in just 11-31 days
- See results within 11-31 days
- See (visible) results within - or - in 24 hours
- Same day kill
- Same day action - or - results
- 24 hour kill - or - action
- Fast acting - or - action formula
- Innovative, fast acting - or - action formula that quickly kills roaches
- Effective performance
- (Double) fast killing results
- Provides maximum roach control
- Starts working within hours and continues working for three months
- Works within hours and up to three months
- Starts working in hours, doesn't stop working for three months
- Kills roaches fast before they multiply for long-term control
- Long term control in just three days
- Continuous action for full-on roach protection
- Works every minute of every hour of every day
- Works continuously, (24 hours a day) (7 days a week)
- Works day after day/works day and night
- Works 24/7 around the clock for 3 months
- Provides long-term control
- Works for three months
- Reliable performance for up to three months
- Kills roaches before they become a problem
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops roaches before they become a problem
- Breaks the roach life cycle
- Protects - or - defends your home against roaches
- New!
- Patented (action) formula - or - ingredient
- Special formula
- New generation roach control
- Contains a totally unique insecticide ingredient to kill roaches
- Protect your home from roaches
- For a clean roach free home
- Rids your home of roaches
- Gets rid of roaches (in your home)
- Extremist proven ingredient
- Controls roaches in 3 days
- Controls in 3 days, for 3 months
- Guaranteed to work or your money back
- Easier than before - or - easier than before!

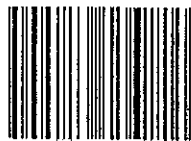
ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 8 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, or the pesticide
registered under EPA Reg. No.

CONTAINS 12 BAIT STATIONS (for small roaches)

CAUTION: DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

TOTAL NET WT 0.6 oz (16.8 g.)



Small Roach Bait

EPA Reg. No. 64240-33
EPA Est. No. 5813-MS-01
U.S. Patent Nos.

and other patents pending



This product and the bait stations are registered under the Federal Insecticide, Fungicide, and Rodenticide Act.

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1221 Broadway, Oakland, CA 94612
MADE IN U.S.A.

R-10122-3 (master)

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COMBAT®

SMALL ROACH BAIT F.03

For Small Roaches

GUARANTEED TO WORK
[or your money back!]

THIS IS HOW COMBAT® SMALL ROACH BAIT F.03 WORKS:

- 1** Roaches enter the bait station and eat the bait.
- 2** Roaches return to their nest and die.
- 3** Other roaches eat them and die, creating a chain reaction.

-or-

THIS IS HOW COMBAT® WORKS:

- 1** Roaches enter the bait station and eat the bait.
- 2** Roaches take the bait back to the nest.
- 3** Roaches share the bait, killing other roaches and destroying the nest.



- COMBAT® BAIT STATIONS CONTAIN A TOTALLY UNIQUE INSECTICIDE INGREDIENT TO KILL ROACHES.
- LABORATORY AND HOME USE TESTS PROVE COMBAT® PROVIDES 3 MONTHS OF EFFECTIVE ROACH CONTROL.
- EASY TO USE-NOTHING TO ACTIVATE
- NO VAPOR, FUMES OR ODOR

EFFECTIVENESS GUARANTEED:

COMBAT® Insect Control Systems stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding Combat® baits, please call 1-800-426-6228.



For more information, call the Combat® Labs Information Helpline at 1-800-426-6228. -or- [For questions or comments, please c) [C]all the Combat® Labs [Information] Helpline at 1-800-426-6228 [for more information].

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH THE LABELING.

1. Remove wrapper and separate bait stations from plastic frame. -or- Remove wrapper and break baits apart. Tear apart along perforation lines. Do not remove or puncture the label on bait station. Now the baits are ready to use. Use all 12 baits at one time.
2. Place baits wherever you see roaches. [Some of the most likely locations -or- hiding places for roaches are shown in the diagram to the right.] TIP: For best results, place baits about 1 1/2 feet away from each other.
3. [For best results, use all 12 bait stations at one time.] -or- Put out all 12 baits. If you have fewer than 12 places where you have seen roaches, place the extra baits about 1 1/2 feet away from the other baits that you have just placed. Place any remaining baits in likely roach hiding places. TIP: [Roaches find the bait faster when more bait stations -or- baits are placed out.]
4. TIP: Bait stations -or- baits work best when touching walls or corners [Use enclosed adhesive squares when placing baits on walls or upside down. It is not necessary to use stickers on all baits.]
5. Replace all 12 baits every 3 months, or sooner if roaches return because roaches have probably eaten all of the bait inside.

[Do not use sprays or foggers around bait stations: they can contaminate bait stations and reduce effectiveness.] [Bait stations work best on horizontal surfaces touching corners and next to walls.] [Use enclosed stickers for vertical surfaces.]

STORAGE AND DISPOSAL

STORAGE: Store in cool, dry area out of reach of children.

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 12 bait stations at one time.] Replace bait stations every 3 months.]

Under/around sink	Kitchen:	Near doors
Under refrigerator	On counters	On floor/ in corners
Under stove	In cupboards/drawers	
	Near garbage cans	
	Bathroom:	
Behind toilet	Near shower/bathtub	On floor/ in corners
Under/around sink	Inside cabinets/ drawers	

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations.

The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).

Normal infestation requires 12 bait stations.



PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION

Wash thoroughly with soap and water after handling bait stations.

This product is specially designed for small roaches.



Small, 1/2" Cockroach
Habits: Primarily live and breed in moist areas like kitchens and bathrooms. For effective control, bait stations should be placed wherever roaches have been seen in your home.

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The artwork is shown below at 200% of actual size.

COMBAT®
SMALL ROACH
BAIT F.03

THIS SIDE DOWN This side should be placed against surface.
(Note: Do not remove or puncture this label.)

ACTIVE INGREDIENT: Fipronil (5-Amino-
1-(2,6-dichloro-4-(trifluoromethyl)
phenyl)-4-(1,1,1-trifluoromethyl-
sulfonyl)-1H-pyrazole-3-carbonitrile) 0.03%
INERT INGREDIENTS:99.97%

**CAUTION: DO NOT ALLOW CHILDREN OR PETS
TO PLAY WITH THE BAIT STATION.**

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

For more information, call the Combat® Labs Information Helpline at
1-800-426-6228, -or- [For questions or comments, please c] [Call the Combat®
Labs [Information] Helpline at 1-800-426-6228 [for more information].

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1221 Broadway, Oakland, CA 94612

EPA Reg. No. 64240-33

NET WT 0.05 oz (1.4 g.)

EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND ADDITIONAL PRECAUTIONARY STATEMENTS

RU-10122-2 (master)

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