

64240-33

8-9-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Robert S. Brennis  
Product Registration  
Combat Insect Control Systems  
15101 N. Scottsdale Rd.  
Scottsdale, AZ 85254

AUG 9 2007

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request Minor Label Change  
EPA Reg. No. 64240-33  
Application Dated July 19, 2007

Dear Mr. Brennis:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/19/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) 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, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

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<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other - Notification	OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 64240-33	2. EPA Product Manager Richard Gebken	3. Proposed Classification  <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Small Roach Bait F.03	PM# PM 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15101 N. Scottsdale Rd. Scottsdale, AZ 85254 <b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

**Explanation:** This is a simple notification to add the word Roach under our graphic so customers know what the target pest is. We have added language to identify whether the diagram referred to is below. We added the name of the product to the reference regarding how the product works. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. This notification is consistent with the provisions of PR Notice 98-10 and 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be 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 checked="" type="checkbox"/> No <b>*Certification must be submitted</b>	Unit Packaging		Water Soluble Packaging		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" 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 checked="" 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 Robert S. Brennis, Lewis & Harrison 122 C St. NW, Suite 740, Washington, DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 20
Certification 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  (Stamped)
2. Signature 	3. Title Agent for Combat Insect Control Systems	
4. Typed Name Robert S. Brennis	5. Date July 19, 2007	

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# LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

July 19, 2007

Richard Gebken, PM Team 10  
U.S. Environmental Protection Agency  
Office of Pesticide Programs (7504C)  
Document Control Desk (Notif)  
1801 Bell Street S.  
Arlington, VA 22002

**Combat Insect Control Systems**

**Combat® Small Roach Bait F.03, EPA Appl. No. 64240-33**

**Notification**

Dear Mr. Gebken:

This is a simple notification to add the word Roach under our graphic so customers know what the target pest is. We have added language to identify whether the diagram referred to is below. We added the name of the product to the reference regarding how the product works. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. This notification is consistent with the provisions of PR Notice 98-10 and 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions about the enclosed registration submission, please contact me either, by telephone at 202-393-3903 ext. 20 or by e-mail at [rbrennis@lewisharrison.com](mailto:rbrennis@lewisharrison.com).

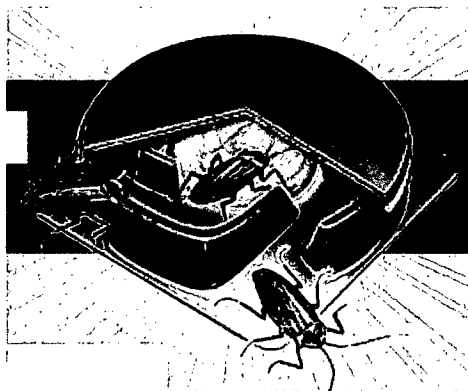
Sincerely,



Robert S. Brennis  
Agent for Dial Corporation

ENCLOSURE

## COMBAT<sup>®</sup> Small Roach Bait F.03



For Small Roaches  
Overnight [Action] Formula  
Kills Overnight & Keeps on Killing for up to 6 Months[\*]

### [ROACH]

ACTIVE INGREDIENTS: Fipronil†.....0.03%

OTHER INGREDIENTS: .....99.97%

† CAS No. 120068-37-3

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

### **CAUTION:**

See precautionary statements on back *-or-* side panel.

EPA Reg. No. 64240-33

EPA Est. No. 071106-GA-001

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[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

[Combat GUARANTEED to work [OR YOUR MONEY BACK]]

[CONTAINS] 12 ~~-or-~~ 18 ~~-cr-~~ 30

Child-resistant bait stations [for small roaches]

[TOTAL] NET WT. [0.42 oz. (12g)] [0.63 oz. (18g)] [1.06 oz (30g)]

[U.S. Patent Nos. \_\_\_\_\_ and others pending.]

[♻️] [[The paperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_% Recycled fiber [minimum  
\_\_\_\_\_% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

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

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Master Label, July 2007  
EPA Reg. No. 64240-33  
Combat Small Roach Bait F.03  
Pg 2 of 7

## PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**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: Do not reuse this container. Place in trash [or offer for recycling if available]. If partly filled: Call your local solid waste agency or [toll free number] 1-800-

CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

## DIRECTIONS FOR USE

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

### GENERAL INFORMATION

#### [THIS IS] [HOW] [THIS] [Combat] ] PRODUCT 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-

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



- Laboratory and home use tests prove Combat® provides up to 1-6 months[\*] of effective roach control
- Easy to use – nothing to activate
- No vapor, fumes, odor [or] [mess]

[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.]

\* The success of this product to kill/control small cockroaches can be affected by cockroach population size, sanitary conditions and the extent to which other residents apply cockroach control methods.

-or-

\* 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.

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

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Master Label, July 2007  
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Combat Small Roach Bait F.03  
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## DIRECTIONS FOR USE, continued

### MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 12 **-or-** 18 bait stations at one time.] [Replace bait stations every 3 **-or-** 6 months[\*]].

#### Kitchen:

Under/around sink  
Under refrigerator  
Under stove

On counters  
In cupboards/drawers  
Near garbage cans

Near doors  
On floor/in corners

#### Bathroom:

Behind toilet  
Under/around sink

Near shower/bathtub  
Inside cabinets/drawers

On floor/in corners

**-or-**

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations. **-or-** 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). **-or-** Normal infestation requires 12 **-or-** 18 bait stations.

[\*Applies to claims of greater than 3 months.]

DATE PLACED (Month/Year)	LOCATION	REPLACEMENT DATE (After 3 -or- 6[*] Months)

**This product is specifically designed for small roaches.**

Small, ½" 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.

## DIRECTIONS FOR USE, continued

### GENERAL RESTRICTIONS

Do not remove or puncture label on bait stations.

### APPLICATION INSTRUCTIONS

1. [Remove wrapper.] [For best results] [U]se all 12 **-or-** 18 baits [at one time]. Break baits apart. Do not remove or puncture [the] label[s] on bait station[s]. [Now the baits are ready to use.]
- 2.[1.] Place baits wherever you see or have seen roaches **-or-** signs of roaches **-or-** where roaches are found. Then place additional baits about 1 ½ feet away. [Put any remaining baits as **-or-** Some of the most likely locations **-or-** [roach] hiding places for roaches are shown in the diagram[s] to the right **-or-** left **-or-** above **-or-** below. [TIP: For best results, place baits about 1 ½ feet away from each other.]
3. Put out all 12 **-or-** 18 baits. If you have fewer than 12 **-or-** 18 places where you have seen roaches, place the extra baits about 1 ½ feet away from the other baits that you have just placed. Roaches find the bait faster when all bait stations **-or-** baits are placed out.
- 4.[2.] Place baits properly so that they are touching walls or corners. [TIP: Place properly. Bait stations **-or-** Baits work best on horizontal surfaces when touching walls or corners. Only use enclosed stickers [as needed] when placing baits on walls or upside down. It is not necessary to use stickers on all baits.]
- 5.[3.] Replace all baits every 3 **-or-** 6 months[\*], or sooner if roaches return [because roaches have probably eaten all of the bait inside]. [Need to replace baits since the roaches have probably eaten all the bait inside.]

[TIP:] [Do not use sprays or foggers around bait stations.] [They can contaminate bait stations and reduce effectiveness.] [Use enclosed stickers for vertical surfaces.]





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### ***Claims for front or back***

- Kills [for] up to 1-6 months[\*]
- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- Kills roaches where they hide ***-or-*** breed ***-or-*** live ***-or-*** at the source
- Non-stop roach control for up to 6 months[\*]
- Satisfaction ***-or-*** Quality Guaranteed
- Kills roaches you see and [even] those you don't
- Protects ***-or-*** Defends your home against roaches
- Guaranteed to work or your money back
- Child resistant bait stations
- Continuous roach control for up to 1-6 months[\*]
- Kills non-stop for up to 1-6 months[\*]
- Kills roaches and keeps on killing for up to 1-6 months[\*]
- Provides maximum roach control for up to 1-6 months[\*]
- Works within hours and for up to 1-6 months[\*]
- Starts working ***-or-*** killing in hours, doesn't stop working for 1-6 months[\*]
- Keeps killing for up to 1-6 months[\*]
- Better bait formula [for improved control]\*\*
- Increased feeding [for improved control]\*\*
- With foods roaches prefer
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- [Bonus Pack] (***applies to packs to which more baits are added***)
- [50% More Free] (***applies to packs to which 50% more baits are added***)
- [6 Bonus Baits With Purchase] (***applies to packs to which 6 more baits are added***)

\*[Applies to claims of greater than 3 months]

\*\* vs. previous formula

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Master Label, July 2007  
EPA Reg. No. 64240-33  
Combat Small Roach Bait F.03  
Pg 7 of 7

**UNIT LABEL**

**COMBAT® Small Roach Bait F.03**

**THIS SIDE DOWN OR AGAINST SURFACE**

**Note: Do not remove or puncture this label.**

ACTIVE INGREDIENTS: Fipronil†.....0.03%

OTHER INGREDIENTS: .....99.97%

† 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.

**DISPOSAL: If empty:** Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** 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.]

EPA Reg. No. 64240-33

EPA Est. No. 071106-GA-001

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[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

**SEE OUTER CARTON – or - BAG FOR COMPLETE DIRECTIONS AND PRECAUTIONS**

NET WT [0.035 oz (1g)] **-or-** [0.05 oz (1.4g)]