

64240-33

( 03-17-2011 )

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

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MAR 17 2011

Combat Insect Control Systems  
c/o Lewis & Harrison  
122 C Street, N.W., Suite 740  
Washington, D.C. 20001

Subject: Amendment for Child-resistant Packaging Certification  
EPA Reg. No. 64240-33  
Submission dated October 26, 2010  
Decision No: 441587, S: 884633

Dear Ms. Anastasiou:

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 condition below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

- As a condition of this amendment, new confirmatory child-resistant packaging data conducted with at least nine bait stations must be submitted for the large roach bait stations, which demonstrate continued compliance with the standards of 40 CFR 157.32. These new data must be submitted to the Agency by July 1, 2011.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this action, please contact Rosanna Louie-Juzwiak at (703) 308-0037.

Sincerely,

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

Richard Gebken  
Product Manager 10, Insecticide Branch  
Registration Division (7505P)

Enclosure: Combat Small Roach Bait F.03 Label, Stamped *Accepted with Comments*

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

Master Label, MARCH 17, 2011  
EPA Reg. No. 64240-33  
Combat Small Roach Bait F.03  
Pg 1 of 6

## COMBAT® Small Roach Bait F.03

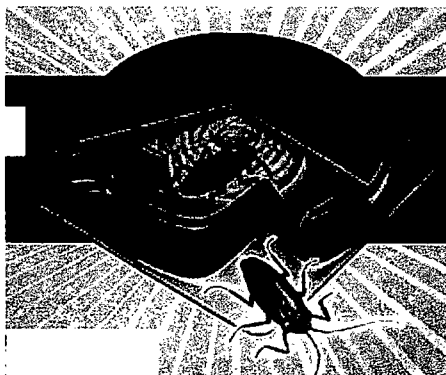
*Approved Alternate Brand Names:*

**Combat Quick Kill Formula 1**

**Combat Plus<sup>Brand</sup> Quick Kill Formula 1 Roach Baits**

**Combat Source Kill Max R1**

**Combat Defense System<sup>Brand</sup> Source Kill Max R1**



*Above illustration is a placeholder for graphic(s) depicting roaches in or near a representative bait station.*

ACTIVE INGREDIENT: Fipronil<sup>†</sup> ..... 0.03%  
OTHER INGREDIENTS:..... 99.97%  
TOTAL.....100.00%

<sup>†</sup> CAS No. 120068-37-3

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

### **CAUTION:**

See precautionary statements on [back] [side] [bottom] panel.

EPA Reg. No. 64240-33      EPA Est. No. \_\_\_\_\_

Distributed by & ©2011 Combat Insect Control Systems  
[19001 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85255  
[MADE IN U.S.A.]

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

**MAR 17 2011**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
64240-33**

[Small Bait Stations:] [CONTAINS] [2] [4] [6] [8] [12] [18]

[Large Bait Stations:] [CONTAINS] [6] [8]

Child-resistant bait stations [for large and small roaches]

[TOTAL] NET WT. [0.07 oz. (2g)] [0.14 oz. (4g)] [0.21 oz. (6g)] [0.28 oz. (8g)]

[0.42 oz. (12g)] [0.63 oz. (18g)] [0.84 oz. (24g)] [1.06 oz. (30g)]

[0.3 oz. (8.4g)] [0.4 oz. (11.2g)]

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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.]

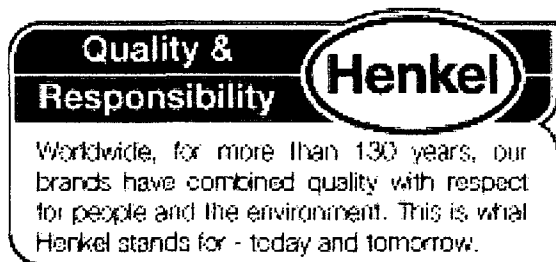
[Combat®] [Guaranteed to work [or your money back]!

[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].



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

*{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}*



**-or-**



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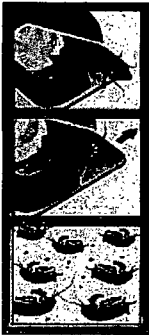
[GENERAL INFORMATION]

[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] 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 [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.



***[Table below is optional.]***

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

[This product is specifically designed for small and large roaches.]

[Small, ½" Cockroach Habits: Primarily live and breed in moist areas like kitchens and bathrooms.]

[Large, 1" to 1 ½" Cockroach. Habits: Primarily live and breed outdoors and enter homes in search of food. Bait station placement near potential points of entry is key.]

## DIRECTIONS FOR USE

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

### [APPLICATION INSTRUCTIONS]

1. [Remove wrapper.] [U]se all [2] [4] [6] [8] [12] [18] baits [at one time] [at the same time]. Break baits apart. Do not remove or puncture [the] label[s] on bait station[s]. [Now the baits are ready to use.]
2. Place baits wherever [you see or have seen [roaches] [signs of roaches]] [where roaches are found] [in the following places: under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.]  
Then place additional baits about 1½ feet away. [Put any remaining baits as shown in the diagram[s] to the [right] [[left] [above] [below.] [Some of the most likely [locations for roaches] [roach hiding places] are shown in the diagram[s] to the [right] [left] [above] [below]. [Roaches find the bait faster when all bait stations [baits] are placed out.]  
**Do not use in beehives.**
3. Place baits properly so that they are 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.] [Do not use sprays or foggers around bait stations.] [They can contaminate bait stations and reduce effectiveness.]
4. Replace all baits every [3] [6 months], or sooner if roaches return [because roaches have probably eaten all of the bait inside]. [Baits will need to be replaced since [because] [the] roaches have probably eaten all the bait inside.]



**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.

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***  
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***Claims for front or back***

- Kills large and small roaches
- Kills [for] up to 6 months
- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- For [Large] [and] [Small] Roaches
- Starts Killing Overnight [& Keeps on Killing for up to 6 Months]
- Starts working overnight [& Keeps on Killing for up to 6 Months]
- Starts working as soon as [cock]roaches feed on bait
- ROACH
- Large Roach
- Small Roach
- Kills roaches [where they [hide] [breed] [live]] [at the source]
- Non-stop roach control for up to 6 months
- [Satisfaction] [Quality] Guaranteed
- Kills roaches you see and [even] those you don't
- [Protects] [Defends] your home against roaches
- Child resistant bait stations
- Continuous roach control for up to 6 months
- Kills non-stop for up to 6 months
- Kills roaches and keeps on killing for up to 6 months
- Provides maximum roach control for up to 6 months
- Works within hours and for up to 6 months
- Starts [working] [killing] in hours, doesn't stop working for up to 6 months
- Keeps killing for up to 6 months
- Better bait formula [for improved control]\*\*                      \*\* vs. previous formula
- Increased feeding [for improved control]\*\*                      \*\* vs. previous formula
- With foods roaches prefer
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- Easy to use
- Nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor

***Will not exceed 18 small bait stations or 8 large bait stations:***

- Bonus Pack\*\*\*
- 50% More [Free]\*\*\*
- 100% More [Free]\*\*\*
- [50%] More Baits\*\*\*
- [100%] More Baits\*\*\*
- [6] [2] Bonus Baits With Purchase
- More Baits – Better Value\*\*\*
- Value Pack – More Baits\*\*\*

\*\*\* vs. [standard size] [count] [ct.] [package] [pkg.] [of this [Combat] product]

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Master Label, MARCH 17, 2011  
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**BAIT STATION UNIT LABEL**

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

***Alternate Brand Names:***

**Combat Quick Kill Formula 1**  
**Combat Plus<sup>Brand</sup> Quick Kill Formula 1 Roach Baits**  
**Combat Source Kill Max R1**  
**Combat Defense System<sup>Brand</sup> Source Kill Max R1**

**THIS SIDE DOWN OR AGAINST SURFACE**

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

ACTIVE INGREDIENT: Fipronil<sup>†</sup> ..... 0.03%  
OTHER INGREDIENTS:..... 99.97%  
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.

**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.]

EPA Reg. No. 64240-33      EPA Est. No. \_\_\_\_\_  
Distributed by & ©2011 Combat Insect Control Systems  
[19001 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85255

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

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