

64240-33

9/9/2011

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

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

SEP - 9 2011

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

Subject: Amendment for Confirmatory Large Roach Child-resistant Packaging Data
EPA Reg. No. 64240-33
Submission dated May 19, 2011
Decision No: 450912

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.

Please note that due to the updated Containers and Containment Rule, and because that this product is intended for single-use only, the following statements can be removed from the Storage and Disposal section:

- "Do not reuse or refill this container."
- "Never place unused product down any indoor or outdoor drain."

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)

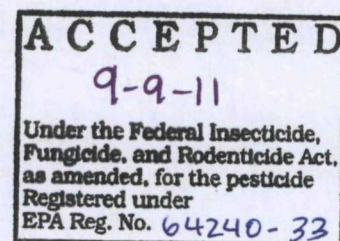
Enclosure: Combat Small Roach Bait F.03 Label, Stamped *Accepted*

OK 207

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

Master Label, JULY 13, 2011
EPA Reg. No. 64240-33
Combat Small Roach Bait F.03
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COMBAT[®] Small Roach Bait F.03
Approved Alternate Brand Names:
Combat Quick Kill Formula 1
Combat Plus^{Brand} Quick Kill Formula 1 Roach Baits
Combat Source Kill Max R1
Combat Defense System^{Brand} Source Kill Max R1



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

ACTIVE INGREDIENT: Fipronil[†] 0.03%
OTHER INGREDIENTS:..... 99.97%
TOTAL.....100.00%

[†] 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.]

[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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Combat Small Roach Bait F.03
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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 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].



[[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.]

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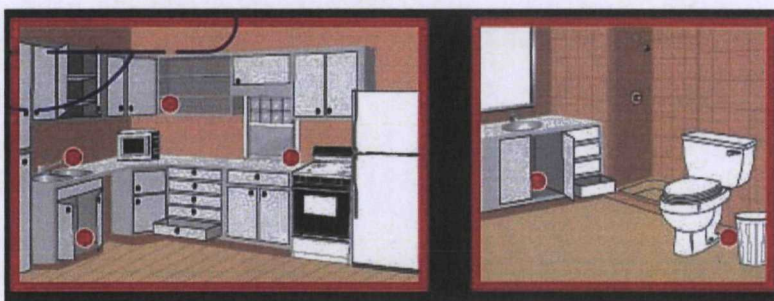
Master Label, JULY 13, 2011
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DIRECTIONS FOR USE

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

[APPLICATION INSTRUCTIONS]

1. [Remove wrapper.] [U]use all [2] [4] [6] [8] [12] [18] baits [at one time] [at the same time]. **Break baits apart from plastic frame.** 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.

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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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BAIT STATION UNIT LABEL

COMBAT[®] Small Roach Bait F.03

Alternate Brand Names:

Combat Quick Kill Formula 1
Combat Plus^{Brand} Quick Kill Formula 1 Roach Baits
Combat Source Kill Max R1
Combat Defense System^{Brand} Source Kill Max R1

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Fipronil[†] 0.03%
OTHER INGREDIENTS:..... 99.97%
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.

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.]

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

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