

64240-33

07/09/2012

1/10



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

JUL - 9 2012

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 June 26 2012 for the following product(s)


Combat Max Roach Killing Bait S Alternate Brand Name


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

Combat^o Small Roach Bait F 03 EPA Reg No 64240 33

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely


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

| | | | |
|---|--|---|-----------------------|
|  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 |
|---|--|---|-----------------------|

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# 10 | |
| 5 Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc 19001 N Scottsdale Rd Scottsdale AZ 85255 NOTE PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW <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 EPA Reg No NOTIFICATION Product Name JUL - 9 2012 |

Section II

| | |
|---|---|
| <input type="checkbox"/> Amendment Explain below <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification Explain below | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> Me Too Application <input type="checkbox"/> Other Explain below |
|---|---|

Explanation Use additional page(s) if necessary (For Section I and Section II)

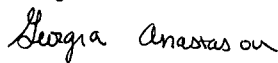
Notification of the Alternate Brand Name Combat Max Roach Killing Bait S

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 | | | |
| 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 | 2 Type of 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 122 C St NW #740 Washington DC 20001 | Title Agent for Combat Insect Control Systems | Telephone No (Include Area Code) 202 393 3903 ext 19 | |
| 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 System | | |
| 4 Typed Name Georgia Anastasiou Lewis & Harrison LLC | 5 Date June 26 2012 | | |

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

June 26 2012

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 Small Roach Bait F 03 (EPA Reg No 64240 33)
Notification per PR Notice 98 10 Alternate Brand Name**

Dear Mr Gebken

On behalf of Combat Insect Control Systems I submitting a notification to propose the following alternate brand name for the product Combat Small Roach Bait F 03 (EPA Reg No 64240 33)

Combat Max Roach Killing Bait S

In support of this submission enclosed please find an Application for Pesticide Notification which includes a signed statement certifying compliance with PR Notice 98 10 and a copy of the master label with the proposed brand name

If you have any questions please contact me at 202 393 3903 ext 19 or by email at georgia@lewisharrison.com I thank you in advance for your cooperation

Sincerely

Georgia Anastasiou

Georgia Anastasiou
Agent for
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

4/10

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

Master Label June 26 2012
 EPA Reg No 64240 33
 Combat Small Roach Bait F 03
 Pg 1 of 7

COMBAT[®] Small Roach Bait F 03

Approved Alternate Brand Names

Combat Quick Kill Formula 1

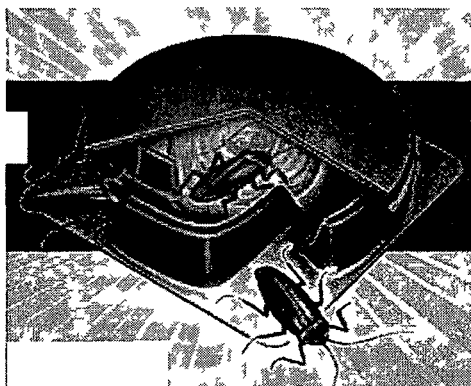
Combat Plus^{Brand} Quick Kill Formula 1 Roach Baits

Combat Source Kill Max R1

Combat Defense System^{Brand} Source Kill Max R1

Proposed Alternate Brand Name

Combat Max Roach Killing Bait S



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

NOTIFICATION

JUL - 9 2012

| | |
|---|---------|
| 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)]

5/10

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

Master Label June 26 2012
EPA Reg No 64240 33
Combat Small Roach Bait F 03
Pg 2 of 7

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

Master Label June 26 2012
EPA Reg No 64240 33
Combat Small Roach Bait F 03
Pg 3 of 7

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 drain or outdoor drain

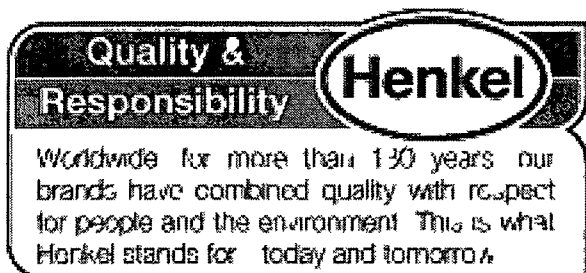
[U S Patent Nos _____ and others pending]

[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]all 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]arton [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-



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

Master Label June 26 2012
EPA Reg No 64240 33
Combat Small Roach Bait F 03
Pg 4 of 7

[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]

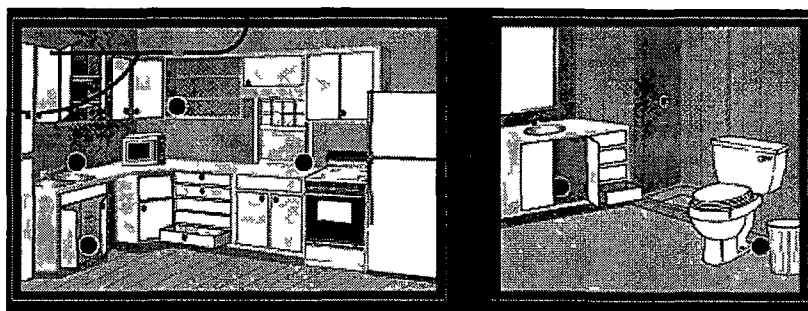
[Large 1 to 1 ½ Cockroach Habits Primarily live and breed outdoors and enter homes in search of food Bait station placement near potential points of entry is key]

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

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]

10/10

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

Master Label June 26 2012
EPA Reg No 64240 33
Combat Small Roach Bait F 03
Pg 7 of 7

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

Proposed Alternate Brand Name

Combat Max Roach Killing Bait S

THIS SIDE DOWN OR AGAINST SURFACE

Note Do not remove or puncture this label

ACTIVE INGREDIENT 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** 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)]