

64240-33

11/25/2013

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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

NOV 25 2013

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 October 25, 2013 for the following product(s):

Combat Defense System Brand
Max Roach Killing Bait S

Alternate Brand Name

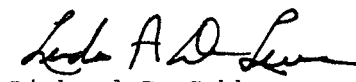
The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Combat® 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,


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

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

 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
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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 Lewis & Harrison, LLC 122 C Street, NW Suite 505 Washington, DC 20001 <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: <div style="text-align: center; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ Product Name NOV 25 2013

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

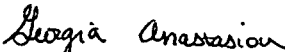
Notification to add alternate brand name and fix typographical error. Please read cover letter for details.

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,	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3933 ext. 19
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 October 25, 2013	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

October 25, 2013

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

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product Combat Small Roach Bait F.03 (EPA Reg. No. 64240-33). The purpose of this notification is to make the following changes:

1. Add the alternate brand name "**Combat Defense System^{Brand} Max Roach Killing Bait S**" and
2. Fix a typographical error in the Storage and Disposal section. Specifically in the "If partially filled" subsection I changed the word "water" to "waste".

In support of this submission enclosed please find the following documents:

- A. Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- B. One (1) copy of the label with changes highlighted; and,
- C. ~~One~~ **(2)** copies of the revised label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for Combat Insect Control Systems

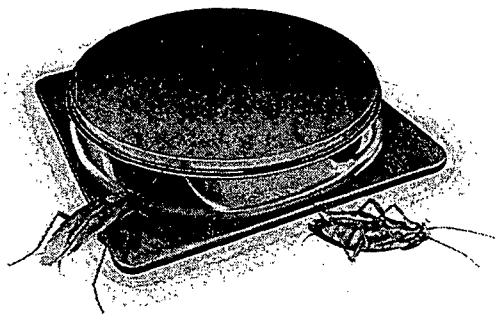
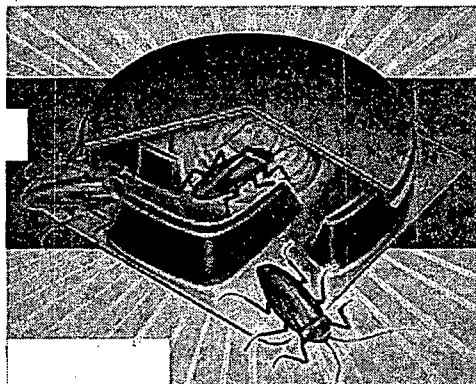
Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text]

Master Label, October 25, 2013
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^{Brand} Quick Kill Formula 1 Roach Baits
Combat Source Kill Max R1
Combat Defense System^{Brand} Source Kill Max R1
Combat Max Roach Killing Bait S
Combat Defense System^{Brand} Max Roach Killing Bait S



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

NOTIFICATION

NOV 25 2013

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. _____

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

[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 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,] [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.]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.}

Optional Henkel statements for front or back or side panel:



-or-



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[GENERAL INFORMATION]

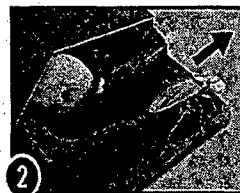
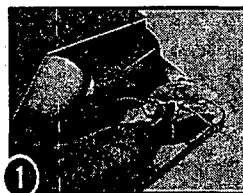
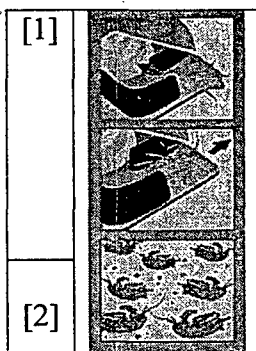
[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] WORKS:

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.

Optional images



[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.]

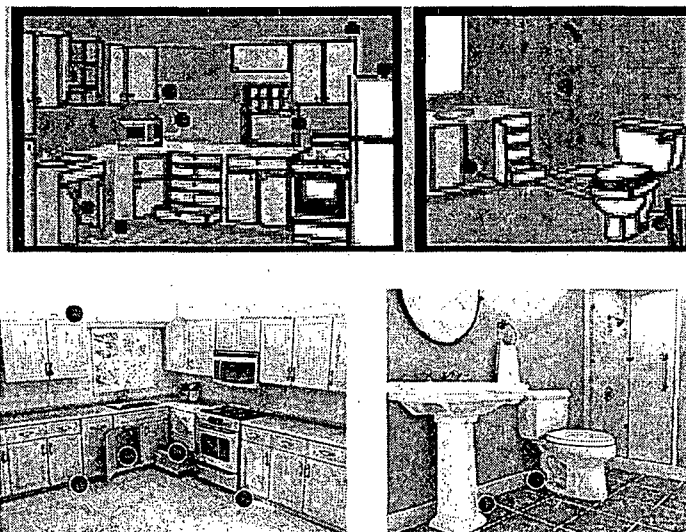
DIRECTIONS FOR USE

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 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 [number of baits] 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.]

[Note to reviewer: Label may include these graphic depictions of recommended placement locations.]



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

Master Label, October 25, 2013
 EPA Reg. No. 64240-33
 Combat Small Roach Bait F.03
 Pg 5 of 6

Optional Claims for front or back

- Kills large and small roaches
- Kills [for] up to 6 months
- Kills [roaches] [quickly] [fast]
- 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]
- [Destroys] [kills] 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]

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
Combat Max Roach Killing Bait S
Combat Defense System^{Brand} 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%
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.]

[Combat [Information] Helpline: 1-800-426-6228]

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

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

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