

64240-33

2/25/2014

1/10



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 25, 2014

Ms. Georgia Anastasiou
Agent for Combat Insect Systems
Lewis & Harrison
122 C Street, N.W. Suite 740
Washington, DC 20001

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 February 4, 2014 for the following product(s):

**Combat Max Defense System Brand
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,

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

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

LEWIS &
HARRISON

Consultants in Government Affairs

February 4, 2013

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

telephone 202.393.3903
fax 202.393.3906

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 to Add Alternate Brand Name

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 add the alternate brand name "Combat Max Defense System Brand Roach Killing Bait S".

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) Two (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,

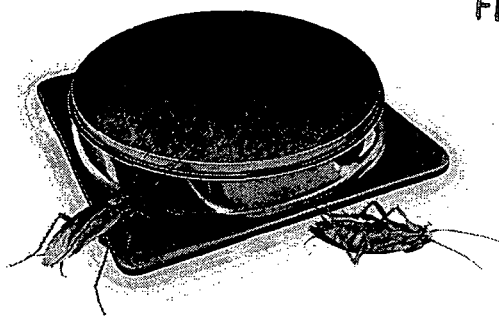
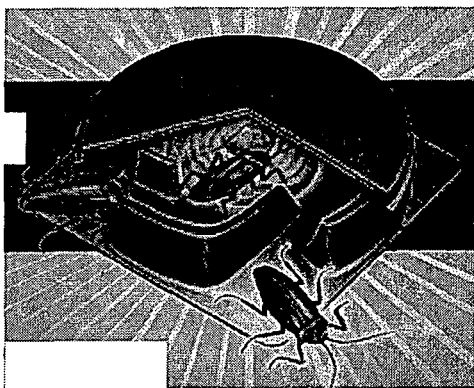
Georgia Anastasion

Georgia Anastasiou
Agent for Combat Insect Control Systems

cc: Arlana Brugato (Combat Insect Control Systems)

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



NOTIFICATION
FEB 25 2014

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

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

[Manufactured for] [Distributed by] [&] ©201[4][5] Combat Insect Control Systems
[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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Note: **Bold, Italicized text is information for the reader and is not part of the label.**
[Bracketed information is optional text]

Master Label, February 4, 2014
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 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]

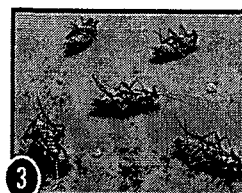
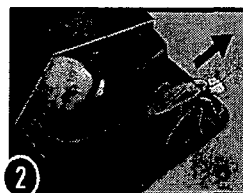
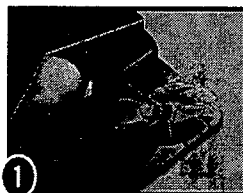
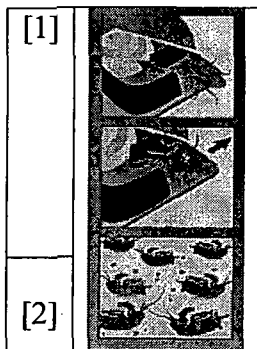
[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] WORKS:

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-

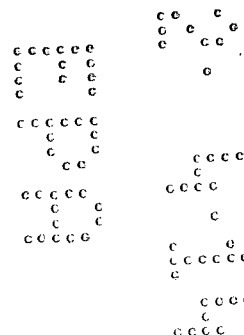
1. Roaches enter the bait station and eat [feed on] the bait.
2. Roaches take the bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.

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.]

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[Bracketed information is optional text]

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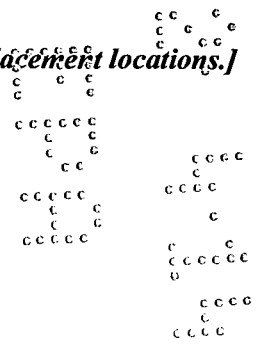
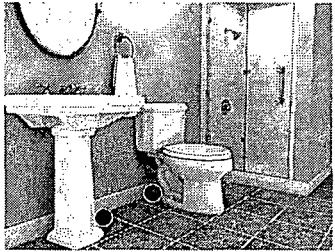
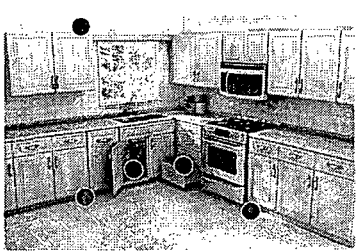
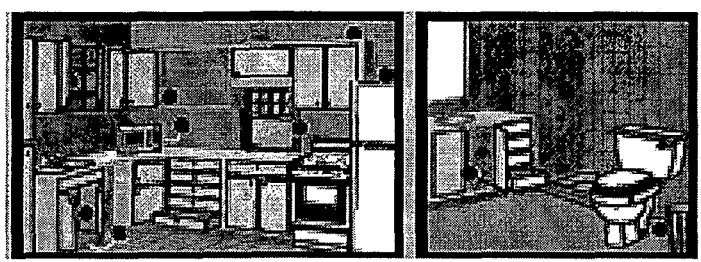
DIRECTIONS FOR USE

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

[APPLICATION INSTRUCTIONS]

1. [Remove wrapper.] [U]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.]



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]**
- 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]
- [Destroy(s)] [kill(s)] the nest
- Easy to use
- Nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor

**** vs. previous formula:**

**** vs. previous formula:**

C C C
 C C C
 C C C
 C C C
 C C C

6 6 6 6 6 6
 6 6 6 6 6 6
 6 6 6 6 6 6

Formula

បញ្ជីប្រធាន

6

c c

CCCEC

cccccc

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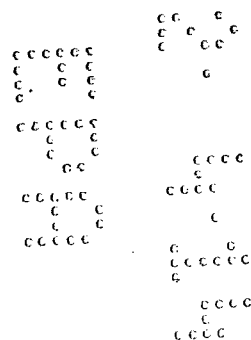
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Will not exceed 18 small bait stations or 8 large bait stations:

- 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
Combat Max Roach Killing Bait S
Combat Defense System^{Brand} Max Roach Killing Bait S
Combat Max Defense System^{Brand} 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] [&] ©201[4][5] 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)]