

PM03

64240-34

7/22/98

115

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 22 1998

J. Evelyn Lawson  
Regulatory Compliance Specialist  
Combat Insect Control Systems  
PO Box 493  
c/o PS&RC  
Pleasanton, CA 94566-0803

Dear Ms. Lawson:

Subject: Combat Large Roach Bait F.03  
EPA Reg. No. 64240-34  
Submission dated 1/27/98

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 comments listed below.

- Delete all egg-killing, egg-stopping, egg-eliminating claims.
- Delete "New" from the label.
- Delete "clean" from the label. Your efficacy data do not demonstrate this.
- Delete all references to the roach nest or submit data to demonstrate that roaches nest.
- Delete all references to dual killing, killing roaches two ways, double action formula, 2 in one formula.
- Delete the graphic that shows two six-packs of bait stations. This product is packaged in units of eight

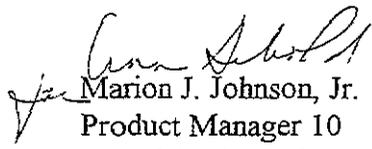
The CRP certification dated July 21, 1998 is acceptable.

Two reviews are attached: the CRP review and the efficacy review.

CONCURRENCES							
SYMBOL	7505C						
SURNAME	a. Subold						
DATE	7-22-98						

One copy of the finished labeling must be submitted prior to releasing the product for shipment. If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



Marion J. Johnson, Jr.  
Product Manager 10  
Insecticide Branch  
Registration Division ( 7505C)

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

JUL 22 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
64240-34



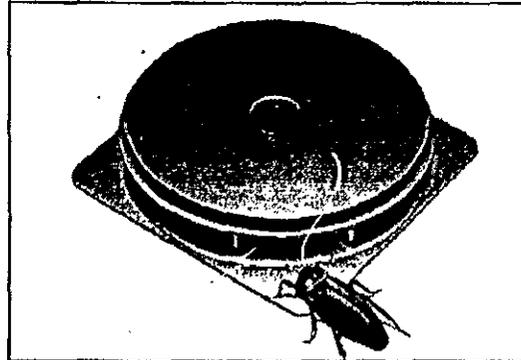
for front or back:

- Kills roaches
- Kills roaches quickly
- See visible results in 2 days
- Begin to see results in 2 days
- Visible results in 2 days
- [New] quick kill formula
- [New] fast action formula
- [New] Kills roaches within 2 days
- A significant reduction will be apparent within 3 days/5 days/1-week
- Starts killing roaches in hours
- Significantly reduces visible roaches within 3 days/5 days/1 week
- Kills the source of the roach problem
- Lets roaches kill roaches
- Kills roaches where they hide/ breed/live
- Kills roaches at the source
- Kills roaches continuously for 3 months
- Continuous roach control for 3 months
- Kills non-stop for 3 months
- Long lasting power/control for 3 months
- Kills roaches and keeps on killing for 3 months
- Ongoing roach control
- Non-stop roach control
- Ongoing control/action
- 24 hour roach killing action
- Improved formula[]
- Effectively kills roaches without a trace -- no fumes, no mess, no odor
- Child resistant bait stations
- Ideal for kitchen use
- Hands all way to get rid of roaches
- Easy to use
- Easy to use; nothing to activate.
- No vapors, no fumes, no odor, no mess

- Easy to use, no clean-up, (no odor)
- The clean way to kill roaches
- Guaranteed to kill roaches for 3 months
- Guaranteed day and night roach control for 3 months
- Guaranteed to rid your home of roaches for 3 months
- Guaranteed to protect your home from roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction -or- Quality Guaranteed
- Kills roaches where you can't find them
- Kills roaches - so you don't see them
- Kills two ways
- Dual killing action
- Dual kill formula
- Double action formula
- Kills roaches you don't see
- Kills roaches you see and (even) those you don't for complete protection
- See dead roaches in 2 days
- See [visible] results in 2 days

# COMBAT

## Large Roach Bait F.03



**For Large Roaches  
Waterbugs & Palmetto Bugs**

- See dead roaches in 48 hours
- See dead roaches in (2-3) days
- Powerful results in just (2-3) days
- See results within (2-3) days
- See [visible] results within -or- in 48 hours
- 48 hour kill -or- action
- Fast acting -or- action formula
- Innovative, fast acting -or- action formula that quickly kills roaches
- Effective performance
- [Delivers] fast killing results

- Provides maximum roach control for 3 months
- Starts working within hours and continues working
- Starts working in hours
- Kills roaches fast before they multiply for long-term control
- Continuous action for [around] the clock protection
- Works every minute of every hour of every day
- Works continuously, (24 hours a day) (7 days a week)
- Works day after day/ works day and night
- Works [around] the clock
- Kills roaches before they become a problem
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops roaches before they become a problem
- Protects -or- defends your home against roaches
- New[]

- Patented [action] formula -or- ingredient
- Special formula
- New generation roach control
- Contains a totally unique insecticide ingredient to kill roaches
- Protect your home from roaches
- For a clean roach free home
- Rids your home of roaches
- Gets rid of roaches (in your home)
- [Eliminates] [kills] large cockroaches [quickly]
- Kills large roaches and Palmetto bugs
- Guaranteed to work or your money back
- Faster than before - or - Faster than before\*
- \*Combat Roach Killing System
- Kills twice as fast as Combat Roach Killing System
- Kills [roaches] [and] [eggs] on contact [while you sleep] [while you are away]
- Kills [roaches] [and] [eggs] when you can't
- Destroys [kills] [roaches] on contact or ingestion
- Kills on contact 24 hours a day, 7 days a week
- Patented action contact kill
- Kills by touch
- Destroys roaches just by touching
- The lethal roach killer
- 2-in-1 Formula.
- Kills roaches and eggs [at same time]
- Kills eggs before they hatch
- Ultimate roach control formula
- Virtually eliminates both roaches and eggs
- Dual action formula
- Kills [back] all the nest

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.  
**CAUTION**  
SEE PRECAUTIONARY STATEMENTS ON BACK -OR- SIDE PANEL.

ACTIVE INGREDIENT: Fipronil\* ..... 0.03%  
OTHER INGREDIENTS: ..... 99.97%  
\*CAS No. 120068-37-3

CONTAINS 8 CHILD-RESISTANT BAIT STATIONS

TOTAL NET WT 0.48 oz (14 g.) -or- 0.8 oz (22 g.)

**COMBAT**  
Large Roach Bait F.03



EPA Reg. No. 64240-34  
EPA Est. No. 5813-MS-01  
U.S. Patent Nos. \_\_\_\_\_ and other patents pending.



[The paperboard in this] [Carton] [contains] [is made from] \_\_\_\_\_ % recycled fiber (minimum \_\_\_\_\_ % post-consumer content).

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1221 Broadway, Oakland, CA 94612  
MADE IN U.S.A.

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# COMBAT

## Large Roach Bait F.03

For Large Roaches  
WATERBUGS & PALMETTO BUGS

**GUARANTEED TO WORK**  
*[or your money back!]*

**EFFECTIVENESS GUARANTEED:**  
COMBAT® Insect Control Systems stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding Combat® baits, please call 1-800-426-6228.



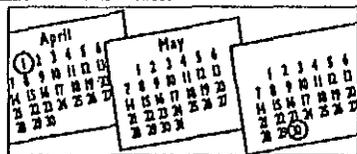
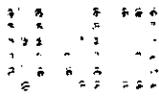
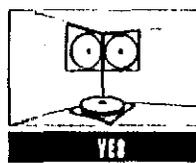
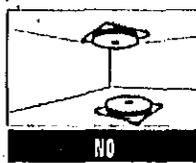
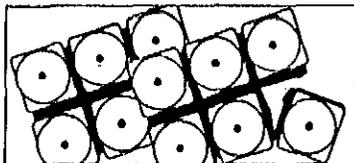
For more information, call the Combat® Labs Information Helpline at 1-800-426-6228.  
-or- [For questions or comments, please c] [C]all the Combat® Labs [Information] Helpline at 1-800-426-6228 [for more information].

### DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

1. Remove wrapper and separate bait stations from plastic frame. -or- Remove wrapper and break baits apart. Tear apart along perforation lines. Do not remove or puncture the label on bait station. Now the baits are ready to use. Use all 8 baits at one time.
2. Place baits wherever you see -or- have seen roaches [or signs of roaches]. [Some of the most likely locations for roaches are shown in the diagram to the right.] TIP: For best results, place baits about 1 1/2 feet away from each other.
3. [For best results, use all 8 bait stations at one time.] -or- Put out all 8 baits. If you have fewer than 8 places where you have seen roaches, place the extra baits about 1 1/2 feet away from the other baits that you have just placed. Place any remaining baits in likely roach hiding places. (as shown in diagrams to the right.) TIP: [Roaches find the bait faster when more bait stations -or- baits are placed out.]
4. TIP: Bait stations -or- baits work best when -or- place baits properly so that they are touching walls or corners (use enclosed adhesive squares when placing baits on walls or upside down. Use enclosed stickers as needed. It is not necessary to use stickers on all baits.
5. Replace all 8 baits every 3 months, or sooner if roaches return because roaches have probably eaten all of the bait inside.

[Do not use sprays or foggers around bait stations: they can contaminate bait stations and reduce effectiveness.] [Bait stations work best on horizontal surfaces touching corners and next to walls.] [Use enclosed stickers for vertical surfaces.]



- THIS IS HOW THIS PRODUCT 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-
- THIS IS HOW COMBAT® WORKS:**
- 1 Roaches enter the bait station and eat the bait.
  - 2 Roaches take the bait back to the nest.
  - 3 Roaches share the bait, killing other roaches and destroying the nest.



- THIS PRODUCT CONTAINS A TOTALLY UNIQUE INSECTICIDE INGREDIENT TO KILL ROACHES.
- EASY TO USE-NOTHING TO ACTIVATE • NO VAPOR, FUMES OR ODOR
- CHILD-RESISTANT

### MOST LIKELY PLACES TO FIND ROACHES



[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 8 bait stations at one time.]

#### Kitchen:

- Under/around sink
- Under refrigerator
- Under stove
- On counters
- In cupboards/drawers
- Near garbage cans
- Near doors
- On floor/ In corners

#### Bathroom:

- Behind toilet
- Under/around sink
- Near shower/bathtub
- Inside cabinets/ drawers
- On floor/ In corners

-or-

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations.

-or-

The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).



### STORAGE AND DISPOSAL

**STORAGE:** Store in cool, dry area [out of reach of children].

**DISPOSAL:** Wrap [used] bait stations in several layers of newspaper and discard in trash.

### PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

### CAUTION

Wash thoroughly with soap and water after handling bait stations.

## FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS:

*This product is specially designed for large roaches, waterbugs & palmetto bugs.*



Large, 1" to 1-1/2" Cockroach  
Habits: Primarily live and breed outdoors and enter homes in search of food. For effective control, bait stations should be put in places where roaches can enter your home.

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The artwork is shown below at 200% of actual size.

# COMBAT

**Large Roach Bait F.03**

**THIS SIDE DOWN:** This side should be placed against surface.  
*(Note: Do not remove or puncture this label.)*

ACTIVE INGREDIENT: Eipronil\* ..... 0.03%  
OTHER INGREDIENTS: ..... 99.97%  
\*CAS No. 120068-37-3

**CAUTION: DO NOT ALLOW CHILDREN OR PETS  
TO PLAY WITH THE BAIT STATION.**

**DISPOSAL:** Wrap (used) bait stations in several layers of newspaper and discard in trash.

For more information, call the Combat Labs Information Helpline at 1-800-426-6228. -or- (For questions or comments, please c) (C)all the Combat Labs (Information) Helpline at 1-800-426-6226 (for more information).

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1221 Broadway, Oakland, CA 94612      NET WT 0.06 oz (1.75g.) -or- 0.1 oz (2.75 g.)

EPA Reg. No. 64240-34

EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND ADDITIONAL PRECAUTIONARY STATEMENTS

RU-10124-4

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