



064240-00034-062599

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Systems Integration Group, Inc.

PM 03

104

JUN 25 1999

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 9/18/98

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 "New Generation Roach Control" from the label. This product no longer meets the criteria of "new".
- Delete or justify the claim "For a clean roach free home" from the label. Your efficacy data do not demonstrate this.
- Delete the claims "Kills two ways and "2-in-1 formula."

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,

Ann Sibold

for Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch

CONFERENCE Insecticide Division (7505C)

SYMBOL								
SURNAME								
DATE								

Note: [Bracketed information is optional text.] Underlined text is new.

64240-34

COMBAT

JUN 25 1999

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

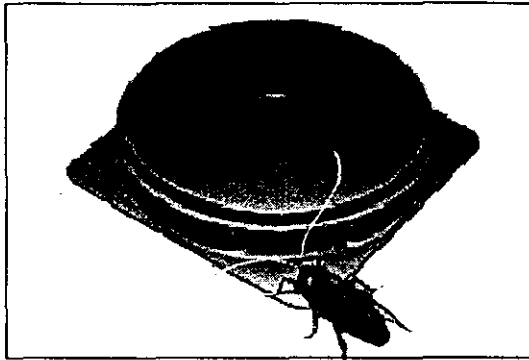
for front or back

Large Roach Bait F.03

for front or back

- Kills roaches
- Kills roaches quickly
- See visible results in 2 days
- Visible results in 2 days
- Quick kill formula
- Fast action formula
- Kills roaches within 2 days
- Starts killing roaches in hours
- Kills the source of the roach problem
- Kills roaches where they hide -or- breed -or- 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 -or- control for 3 months
- Ongoing roach control
- Non-stop roach control
- Ongoing control -or- 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

- Easy to use; nothing to activate.
- No vapors, no fumes, -or- mess
- Easy to use, no clean-up, {no odor}
- 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
- Kills roaches you don't see
- Kills roaches you see and [even] those you don't for complete protection
- See dead roaches in 48 hours
- See dead roaches in [2-3] days
- Powerful results in just [2-3] days
- See [visible] results within -or- in 48 hours



For Large Roaches Waterbugs & Palmetto Bugs

- 48 hour kill -or- action
- Fast acting -or- action formula
- [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 [a]round the clock protection
- Works continuously, [24 hours a day,] [7 days a week]
- Works day after day -or- works day and night
- Works [a]round 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
- 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 hour home]

- Eliminates [kills] large cockroaches [quickly]
- Kills large roaches and Palmetto bugs
- Guaranteed to work or your money back
- Kills roaches when you can't
- Destroys [kills] [roaches] on contact or ingestion
- Kills by 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
- Ultimate roach control formula
- Virtually eliminates roaches
- Kills [back all] the nest
- Faster than before - or - Faster than before*
- Improved formula*
- Improved control*
- [versus] Combat Roach Killing System



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 (14g) -or- 0.8 oz (22g)

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION

SEE PRECAUTIONARY STATEMENTS ON BACK -OR- SIDE PANEL.

COMBAT

Large Roach Bait F.03



Combat, Name of Product

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



[The paperboard in this] [C]arton [contains] [is made from] _____ % recycled fiber (minimum _____ % post-consumer content).

© 1996 Combat Insect Control Systems
1221 Broadway, Oakland, CA 94612
MADE IN U.S.A.

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Note: [Bracketed information is optional text.] Underlined text is new.

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.



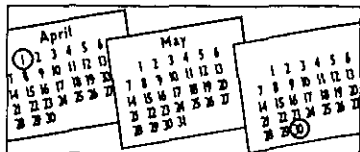
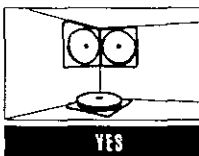
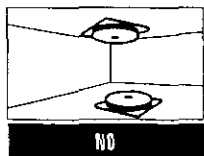
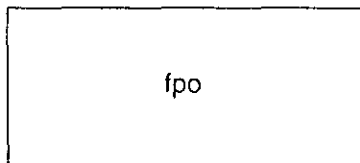
For more information, call the Combat® Labs Information Helpline at 1-800-426-6228.
-or- [For questions or comments, please c] [C]all the Combat® Labs [Information] Helpline at 1-800-426-6228 [for more information].

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.

COMBAT

Large Roach Bait F.03

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Note: [Bracketed information is optional text.] Underlined text is new.

The artwork shown below on Unit Label is approximately 200% of actual size.

64240-34

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: Fipronil* 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 1-800-426-6228 [for more information].

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1221 Broadway, Oakland, CA 94612 NET WT 0.06 oz (1.75g) -or- 0.1 oz (2.75g)
EPA Reg. No. 64240-34 EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND ADDITIONAL PRECAUTIONARY STATEMENTS.

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