

64240-34

08/02/2002

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

AUG - 2 2002

FEDERAL  
AGENCY FOR THE PROTECTION OF  
ENVIRONMENTAL PESTICIDES AND  
TOXIC SUBSTANCES

Sally S. Christopher  
Combat Insect Control Systems  
c/o PS & RC  
P.O. Box 493  
Pleasanton, CA 94566-0803

Dear Ms. Christopher:

Subject: Combat Large Roach Bait F.03  
EPA Reg. No. 64240-34  
Submission dated 4/30/02

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Delete the marketing claims that this product contains a totally unique insecticide ingredient. This is a comparative claim.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

*for Ann Sibold*  
Joseph Tavano  
Acting Product Manager 10  
Insecticide Branch  
Registration Division (7505C)

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

# COMBAT®

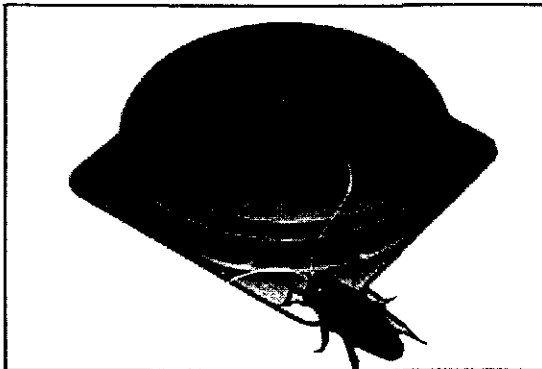
## Large Roach Bait F.03

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
**AUG - 2 2002**

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

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- 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 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



**For Large Roaches**  
**Waterbugs & Palmetto Bugs**

- See [visible] results within -or- in 48 hours
- 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 [around] the clock protection
- Works continuously, [24 hours a day.] [7 days a week]
- Works day after day -or- 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
- Patented [action] formula -or- ingredient
- Special formula
- Contains a totally unique insecticide ingredient to kill roaches
- Protect your home from roaches
- 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
- Kills roaches when you can't
- Destroys [kills] [roaches] on contact or ingestion
- Kills by contact 24 hours a day, 7 days a week
- Kills by touch
- Destroys roaches just by touching
- The lethal [roach] killer
- Kills roaches
- Virtually eliminates roaches
- Faster than before -or- Faster than before\*
- Improved formula\*
- Improved control\*

\*[versus] Combat Roach Killing System



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

**COMBAT®**  
 Large Roach Bait F.03



Contains Poison or Pesticide

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



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

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

t/c

Note: **Bold, italicized text is information for the reader and is not part of the label.**  
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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.



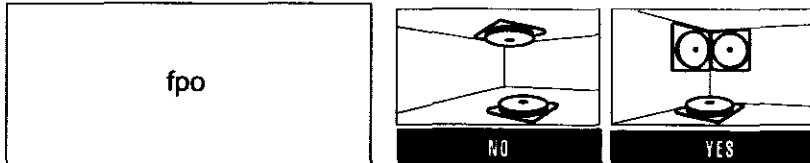
For more information, call the Combat® Labs Information Helpline at 1-800-426-6228.  
 -or- [For questions or comments, please c] [C]all the Combat® Labs [Information] Helpline at 1-800-426-6228 [for more information].

### 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:

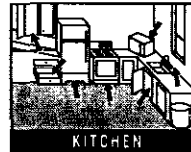
- 1 Roaches enter the bait station and eat the bait.
- 2 Roaches take the bait back to the nest.
- 3 Roaches share the bait, killing other roaches and destroying the nest.



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



**Bathroom:**  
 Behind toilet      Near shower/bathtub      On floor/in corners  
 Under/around sink      Inside cabinets/drawers

-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).

### PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

### CAUTION:

Wash thoroughly with soap and water after handling bait stations.

### STORAGE AND DISPOSAL:

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

**DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

# COMBAT®

## Large Roach Bait F.03

**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 shown below on Unit Label is approximately 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: Fipronil\* ..... 0.03%  
OTHER INGREDIENTS: ..... 99.97%  
\*CAS No. 120068-37-3

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

## CAUTION

**DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

For more information, call the Combate Labs Information Helpline at 1-800-426-6228. -or- [For questions or comments, please c] [C]all the Combate Labs [Information] Helpline at 1-800-426-6228 [for more information].  
Distributed by & © 1996 Combat Insect Control Systems

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 PRECAUTIONS

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