



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Georgia Anastasiou  
Lewis & Harrison, LLC  
122 C St. NW #740  
Washington, DC 20001

MAY 21 2009

RE: Notification of Alternate Brand Names: **Combat Source Kill Max Roach Killing Bait 2**  
**Combat Platinum Brand 3 Roach Killing Bait 2**

EPA Registration Number: 64240-34

Date of Submission: April 6, 2009

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 6, 2009, for the product, Combat Large roach Bait F.03. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

2/9



**EPA**

United States  
**Environmental Protection Agency**  
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number <b>64240-34</b>	2. EPA Product Manager <b>Richard Gebken</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Combat Large Roach Bait F.03</b>	PM# <b>10</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> <b>15501 N. Scottsdale Road</b> <b>Scottsdale, AZ 85260</b> <i>NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</i> <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> 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: right; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ <b>MAY 21 2009</b> _____ Product Name _____	

**Section - II**

- |  |  |
|--|--|
| <input type="checkbox"/> Amendment - Explain below.                            | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application  |
| <input checked="" type="checkbox"/> Notification - Explain below.              | <input type="checkbox"/> Other - Explain below   |

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

**NOTIFICATION OF ALTERNATE BRAND NAMES:**

**Combat Source Kill Max Roach Killing Bait 2**  
**Combat Platinum Brand 3 Roach Killing Bait 2**

**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 <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC,</b> <b>122 C St. NW #740, Washington DC 20001</b>	Title <b>Agent for Combat Insect Control Systems</b>	Telephone No. (Include Area Code) <b>202-393-3903 ext. 19</b>
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 <div style="text-align: center; font-weight: bold; font-size: 1.2em;">(Stamped)</div>
2. Signature <i>Georgia Anastasiou</i>	3. Title <b>Agent for Combat Insect Control System</b>	
4. Typed Name <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC</b>	5. Date <b>April 6, 2009</b>	



4/9

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

MASTER LABEL

# COMBAT® Large Roach Bait F.03

*Current ABN:* [Combat Quick Kill Formula 2]  
*Proposed ABN:* [Combat Source Kill Max Roach Killing Bait 2]  
*Proposed ABN:* [Combat Platinum Brand 3 Roach Killing Bait 2]

**NOTIFICATION**

**MAY 21 2009**

**For Large Roaches  
Waterbugs & Palmetto Bugs**

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 STATIONS.**

## CAUTION:

**See precautionary statements on back – or – side panel.**

### PRECAUTIONARY STATEMENTS:

#### Hazards 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 partially filled:** Call you local solid water agency or toll free number **1-800-**

**CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

Distributed by & ©2009 Combat Insect Control Systems  
19001 N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-34  
EPA Est. No. \_\_\_\_\_

Combat **GUARANTEED** to work [OR YOUR MONEY BACK]  
[CONTAINS] 8 CHILD-RESISTANT BAIT STATIONS  
TOTAL NET WT.0.49 oz (14g) – or – 0.8 oz (22g)



[[The paperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_%  
Recycled fiber [minimum \_\_\_\_\_% post consumer content].]

[PLEASE RECYCLE EMPTY CARTON]

***The label may include illustrations of suggested bait station placement sites.***

### DIRECTIONS FOR USE

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

#### GENERAL INFORMATION

[THIS IS] [HOW] [THIS PRODUCT] WORKS:

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

-or-

THIS IS HOW COMBAT® 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.

- EASY TO USE
- NOTHING TO ACTIVATE
- NO VAPOR, FUMES, [MESS] OR ODOR

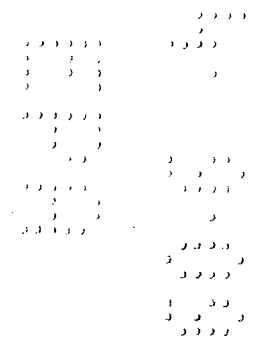
#### EFFECTIVESS GUARANTEED:

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 Large Roaches  
Waterbugs & Palmetto Bugs

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

#### 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).

**FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS:**

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

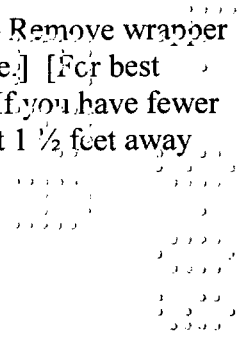
Small, 1" to 1 1/2 " Cockroach Habits:

Primarily live and breed outdoors and enter homes in search of food. For effective control, bait stations should be placed where roaches can enter your home.

APPLICATION INSTRUCTIONS

1. Use all 8 baits [at one time].  
Break baits apart.  
Do not remove or puncture the labels on bait stations.  
Place baits wherever you see - or - have seen roaches [or signs of roaches].  
[TIP:] Place baits about 1 1/2 feet away from each other.  
Place any remaining baits in likely roach hiding places (as shown in diagrams above - or - to the right - or - left).
2. [Baits work best when] Place[ed] [baits] properly so that they are touching walls or corners.  
[Do not use sprays or foggers around bait stations] [: they can contaminate bait stations and reduce effectiveness.]
3. Replace all \_\_\_ baits every 3 months, or sooner if roaches return [because roaches have probably eaten all of the bait inside.]

[Remove wrapper and separate bait stations from plastic frame. - or - Remove wrapper and tear apart along perforation lines.] [Now the baits are ready to use.] [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.] [Some of the most likely locations for roaches are shown in the diagram to the right.]

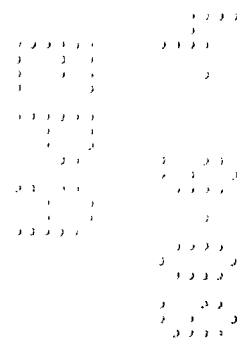
[**TIP:**] [Roaches find the bait faster when more bait stations – or – baits are placed out.]

[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.]

[Bait stations work best on horizontal surfaces touching corners and next to walls.] [Use enclosed stickers as needed for vertical surfaces.]

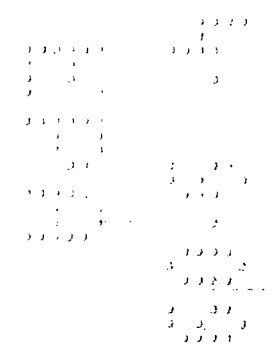
### Claims for front or back

- Kills large roaches, waterbugs and Palmetto bugs
- Kills roaches [quickly]
- Starts killing [roaches] in hours
- [See] visible results in 2 days
- Quick kill formula
- Kills roaches within 2 days
- 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
- Protects *-or-* Defends your home against roaches
- Kills non-stop for 3 months
- Long lasting power *-or-* control for 3 months
- Ongoing [roach] control *-or-* action
- Non-stop roach control
- 24 hour roach killing action
- Effectively kills roaches without a trace – no fumes, no mess, no odor
- Ideal for kitchen use
- 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 *-or-* protect your home of roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction *-or-* Quality Guaranteed
- Kills roaches where you can't see them
- Kills roaches – [so] you don't see [them]
- See dead roaches in 48 hours *-or-* [2-3] days
- Powerful results in just [2-3] days
- 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 [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
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops *-or-* kills roaches before they become a problem
- Protects *-or-* defends your home against roaches
- Patented [action] formula *-or-* Ingredient
- Special formula
- Rids your home of roaches
- Gets rid of roaches [in your home]
- Eliminates [kills] large cockroaches [quickly]
- 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 [large] roaches
- Virtually eliminates roaches
- Faster than before\*
- Improved formula\*
- Improved control\*

\*[versus] Combat Roach Killing System





9/9

SUBLABEL A: UNIT LABEL  
Actual size of unit label is approximately 2.125 in. x 2.125 in.

# COMBAT® Large Roach Bait F.03

[THIS SIDE DOWN OR AGAINST SURFACE]  
[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 STATIONS.**

## CAUTION:

**DISPOSAL: If empty:** Do not reuse this container. Place in trash [or offer for recycling if available]. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[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].  
[Questions or Comments? Call 1-800-426-6228.]

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19001 N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-34  
EPA Est. No. \_\_\_\_\_

[For Large Roaches]

**SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS**

NET WT 0.06 oz (1.75g)– or – 0.1 oz (2.75g)

