

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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

1/9

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

MAY 2 1 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,

 \sim

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

ease read instructions on revers			Form Approved				
	United States		🗌 Registra	ation		OPP Id	entifier Numb
EPA	Environmental Protection	n Agency	Amendi	nent			
	Washington, DC 2040	60	⊠ Other				
	Applicatio	on for Pestic]		1	
Company/Product Number		2. EPA Produc			3.	Proposed C	Classification
4240-34		Richard Gel	bken			None	
Company/Product (Name) ombat Large Roach Ba	it F.03	PM# 10					
Name and Address of Applica	nt (Include ZIP Code)	6. Expedite	d Review. In a	accordance v	vith F	FIFRA Sec	tion 3(c)(3)
Combat Insect Control S		(b)(I), my pro	oduct is similar	or identica	UP	mpesition	and labeling
5501 N. Scottsdale Road cottsdale, AZ 85260	3	10:					
NOTE: PLEASE SEND ALL (CORRESPONDENCE TO	EPA Reg. N	No	<u>-</u>	MAY	Y 2 1 2009	
"CONTACT POINT" LISTEL		Product Na	me				
Check if this is a r	ew address	FIGULEINA					
		Section -	11				
Amendment - Explain bel			Final printed labe	•	to Age	ency letter da	ated
Resubmission in respons		닏	"Me Too" Applica				
Notification - Explain be		(For Section L	Other - Explain b				
Explanation. Use addit	onal page(s) if necessary. (NOTIFICATIO	•	•				
		urce Kill Max					
			I IVACH INHHH	5 Dait 2			
	Combat Plat	tinum Brand (ng Bait 2			
			3 Roach Killii	0			
Notification in Accordance Wi	Combat Plat PLEASE READ th PR Notice 98-10 This notification i	COVER LET	3 Roach Killin TER FOR DE	TAILS.	a regul	ations at 40 C	FR 152.46, and
other changes have been made	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta	COVER LET is consistent with the itement of formula of	3 Roach Killin TER FOR DE e provisions of PR N of this product. I und	TAILS. Notice 98-10 EPA derstand that it is	a viol	ation of 18 U.	S.C. Sec 1001 to
other changes have been made willfully make any false statem	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta ent to EPA. I further understand that	COVER LET is consistent with the itement of formula of if this notification i	3 Roach Killin TER FOR DE e provisions of PR N of this product. I und is not consistent with	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR	a viol Notic	ation of 18 U. e 95-2 and 40	S.C. Sec 1001 to CFR 152.46, thi
other changes have been made willfully make any false statem	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta	COVER LET is consistent with the terment of formula of if this notification i e subject to enforcen	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR	a viol Notic	ation of 18 U. e 95-2 and 40	S.C. Sec 1001 to CFR 152.46, thi
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta eent to EPA. I further understand that n violation of FIFRA and I may be the	COVER LET is consistent with the itement of formula of if this notification i	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR	a viol Notic	ation of 18 U. e 95-2 and 40	S.C. Sec 1001 to CFR 152.46, thi
other changes have been made willfully make any false statem	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta eent to EPA. I further understand that n violation of FIFRA and I may be the	COVER LET is consistent with the itement of formula co if this notification i subject to enforcen Section –	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section	a viol Notic ons 12	ation of 18 U. e 95-2 and 40	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i 1. Material This Product Will E	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential state to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In:	COVER LET is consistent with the itement of formula co if this notification i subject to enforcen Section –	3 Roach Killin TER FOR DE e provisions of PR N of this product. I und is not consistent with nent action and pena III	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section	a viol Notic ons 12	ation of 18 U. e 95-2 and 40 and 14 of FIF	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i 1. Material This Product Will E Child-Resistant Packaging	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta ent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section –	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III //ater Soluble Pack Yes No	TAILS. Notice 98-10 EPA derstand that it is the terms of PR alties under section	a viol Notic ons 12	ation of 18 U. e 95-2 and 40 and 14 of FIF	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i 1. Material This Product Will E Child-Resistant Packaging Yes* No	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta ent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes"	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena III //ater Soluble Pack Yes No Yes"	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per	a viol Notic ons 12	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta ent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes"	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III //ater Soluble Pack Yes No	TAILS. Notice 98-10 EPA derstand that it is the terms of PR alties under section	a viol Notic ons 12	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta tent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt.	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W W No. per container	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena III //ater Soluble Pack Yes No Yes"	Address of the terms of PR alties under section aging No. per container	a viol Notic ons 12	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential state tent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt.	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena III //ater Soluble Pack Yes No Yes"	Advice 98-10 EPA derstand that it is the terms of PR alties under section aging No. per container	2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper	S.C. Sec 1001 tc CFR 152.46, thi RA.
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification i to the labeling or the confidential sta tent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt.	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W W No. per container	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena III //ater Soluble Pack Yes No Yes"	Additional and the section of the se	2. 2. 0n of L	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Directio	S.C. Sec 1001 tc CFR 152.46, thi RA. Itainer
other changes have been made willfully make any false statem product may be i 1. Material This Product Will E Child-Resistant Packaging Yes* No *Certification must be submitted 3. Location of Net Contents Infi	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. formation 4. Size(s) Reserve	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – W No. per If container Pa	3 Roach Killin TER FOR DE e provisions of PR N of this product. I und is not consistent with nent action and pena III /ater Soluble Pack] Yes] No "Yes" ackage wgt.	Additional and the section of the se	2. 2. 0n of L	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp	S.C. Sec 1001 tc CFR 152.46, thi RA. Itainer
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. fires" Ormation 4. Size(s) Reference fixed to Product Lithogra paper g	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section W No. per container Pa etail Container	3 Roach Killin TER FOR DE e provisions of PR N of this product. I unvision to consistent with nent action and pena III //ater Soluble Pack Yes No Yes"	Additional and the section of the se	2. 2. 0n of L	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Directio	S.C. Sec 1001 tc CFR 152.46, thi RA. Itainer
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. fire Yees" Ormation 4. Size(s) Reference fixed to Product Lithografies	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section W No. per container Pa etail Container	3 Roach Killin TER FOR DE e provisions of PR N of this product. I under is not consistent with nent action and penal lill //ater Soluble Pack] Yes] No "Yes" ackage wgt.	Addensional and the second sec	2. 2. 0n of L	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Directio	S.C. Sec 1001 tc CFR 152.46, thi RA. Itainer
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No if "Yes" Unit Packaging wgt. formation 4. Size(s) Reference ffixed to Product Lithogra Paper g	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section – No. per container If container Pa etail Container	3 Roach Killin TER FOR DE e provisions of PR N of this product. I undising the consistent with nent action and penal III /ater Soluble Pack Yes No "Yes" ackage wgt.	Active 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp accompanyin	S.C. Sec 1001 tc CFR 152.46, thi RA. Itainer
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- tent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. firxed to Product ffixed to Product ffixed to Product Stencile	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section W W No. per container Pa etail Container aph glued ed Section	3 Roach Killin TER FOR DE e provisions of PR N of this product. I undising the consistent with nent action and penal III /ater Soluble Pack Yes No "Yes" ackage wgt.	Active 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp accompanyin	S.C. Sec 1001 tc CFR 152.46, thi RA. ntainer becify) ons g product
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. formation 4. Size(s) Reference fixed to Product Lithogram infixed to Product Lithogram ms directly below for identification wis & Harrison, LLC,	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section W W No. per container Pa etail Container aph glued ed Section	3 Roach Killin TER FOR DE e provisions of PR M of this product. I under is not consistent with nent action and penal lill //ater Soluble Pack] Yes] No "Yes" ackage wgt.] Other IV contacted, if neces	Active 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab On Lab	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Juppe of Cor Metal Plastic Glass Paper Other (Sp accompanyin accompanyin s application phone No. (li 202-393-	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product) nclude Area Co 3903 ext. 1 8
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- nent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. Triffixed to Product fifixed to Product fifixed to Product Stencile ms directly below for identification wis & Harrison, LLC, hington DC 20001 Certificatio	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section WW No. per If container Pri etail Container etail Container of individual to be n	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if neces	Addensional and the second sec	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp accompanyin s application phone No. (li 202-393- 6. Date	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product) nclude Area Co 3903 ext. 19 Àpplication
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- nent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. First of the set	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section WW No. per container Press Section etail Container etail Container of individual to be n tof ments thereto a	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if neces t Insect Control are true, accurate a	Addensional and complete.	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product g product) nclude Area Co 3903 ext. 19 Application ived
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- nent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. Triffixed to Product fifixed to Product fifixed to Product Stencile ms directly below for identification wis & Harrison, LLC, hington DC 20001 Certificatio	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section WW No. per container Press Section etail Container etail Container of individual to be n tof ments thereto a	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if neces t Insect Control are true, accurate a	Addensional and complete.	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product) nclude Area Co 3903 ext. 19 Àpplication
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- nent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. First on the size (s) Reference of the size (s) Referenc	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section WW No. per If container Pa etail Container etail Container etail Container of individual to be n of individual to be n nchments thereto a nay be punishable	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if necess by fine or imprison	TAILS. Notice 98-10 EPA derstand that it is is in the terms of PR alties under section aging No. per container 5. Location On Lab On labe esssary, to proce ol Systems and complete. nment or both	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product g product) nclude Area Co 3903 ext. 19 Application ived
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- nent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. First on the size (s) Reference of the size (s) Referenc	COVER LET is consistent with the itement of formula o if this notification i subject to enforcen Section Section WW No. per If container Press etail Container etail Container of individual to be n tof ments thereto a nay be punishable	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if necess by fine or imprison	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab On Lab essary, to proce ol Systems and complete. ment or both rol System	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product g product) nclude Area Co 3903 ext. 19 Application ived
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential sta- tent to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. ormation Container ffixed to Product ffixed to Product ffixed to Product ms directly below for identification twis & Harrison, LLC, hington DC 20001 Age: Certificatio ave made on this form and all atta- ly false or misleading statement m 3. 1	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section W W No. per container Pa etail Container etail Container etail Container of individual to be n tof rocombat on chments thereto a hay be punishable fitte Agent for Combat	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if necess by fine or imprison	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab On Lab essary, to proce ol Systems and complete. nment or both	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product g product) nclude Area Co 3903 ext. 19 Application ived
other changes have been made willfully make any false statem product may be i	PLEASE READ th PR Notice 98-10 This notification is to the labeling or the confidential statement to EPA. I further understand that n violation of FIFRA and I may be the Be Packaged In: Unit Packaging Yes No If "Yes" Unit Packaging wgt. ormation 4. Size(s) Re Container ffixed to Product Lithogra ms directly below for identification twis & Harrison, LLC, hington DC 20001 Age Certificatio ave made on this form and all atta ly false or misleading statement m 3. 1	COVER LET is consistent with the itement of formula of if this notification i subject to enforcen Section Section W W No. per container Pa etail Container etail Container etail Container of individual to be n for Combat on chements thereto a hay be punishable fittle Agent for Comba	3 Roach Killin TER FOR DE e provisions of PR N of this product. I un- is not consistent with nent action and pena III /ater Soluble Pack Yes No "Yes" ackage wgt. Other IV contacted, if necess by fine or imprison	TAILS. Notice 98-10 EPA derstand that it is in the terms of PR alties under section aging No. per container 5. Location On Lab On Lab essary, to proce ol Systems and complete. nment or both	a viol Notic ons 12 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2. 2.	ation of 18 U. e 95-2 and 40 and 14 of FIF Type of Cor Metal Plastic Glass Paper Other (Sp abel Direction accompanyin s application phone No. (In 202-393- 6. Date Cate	S.C. Sec 1001 tc CFR 152.46, thi RA. htainer becify) ons g product g product) nclude Area Co 3903 ext. 19 Application ived



1

۱. .

122 C Street, N.W., Suite 740 Washington, D.C. 20001 telephone 202.393.3903 fax 202.393.3906

Consultants in Government Affairs

April 6, 2009

HAND DELIVERED

9/q

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 10SUBJECT:Combat Insect Control Systems
Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)
Notification per PR Notice 98-10: Alternate Brand Name

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), we are submitting a notification to propose the following alternate brand names for the product Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34):

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

Please note that Jim Roelofs from the OPP Labeling Committee stated the word "Max" is acceptable as part of the brand name. In addition, as noted in the attached EPA letter dated 11/21/06, the words "Platinum Brand" can be used as part of the alternate brand name.

In support of this submission enclosed please find an Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10 and one copy of the label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com. I thank you in advance for your cooperation.

Sincerely,

Seogra anavasion

Georgia Anastasiou Agent for, Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)



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 2 1 2009

For Large Roaches

Waterbugs & Palmetto Bugs

ACTIVE INGREDIENT: Fipronil [†]	0.03%
OTHER INGREDIENTS:	
†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 RO	DACH	ES	2 2 3 2 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	، د د د د ، د ر ر ب ،
		, * -	ر ، ر ، ر ر ، ر ر ، ا ر ر ر ر ، ا ر ر	د د د ر د د ر ر د
	1.1			ן, כני, ני, גי, גי, גי, גי, גי, גי, גי, גי, גי, ג

[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/arc		On counters	Near doors
Under ref		In cupboards/drawers	On floor/in corners
Under sto	ve	Near garbage cans	
Bathroom:			
Behind to	ilet	Near shower/bathtub	On floor/in corners
Under/arc	ound 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

- 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 ½ 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).
 [Baits work best when] Place[ed] [baits] properly so that they are touching walls or
- 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 ½ 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

8/9

1

- 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

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:	
†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.]

Distributed by & ©2009 Combat Insect Control Systems 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)