



MAR 31 2010

Ms. Georgia Anastasiou Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85225

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Anastasiou:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 2007-4 dated March 1, 2010 for the following product(s):

Combat Ant Bait F1 (EPA Reg. No. 64240-30) Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34) Combat ABF7 (EPA Reg. No. 64240-42) Combat Quick Kill Roach Killer Gel (EPA Reg. No. 64240-45) Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on <u>nonrefillable</u> containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely, alexander for

Richard J. Gebken Product Manager Insecticide Branch Registration Division (7505P)

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Plana mod instructions on reverse b			F am. A aaaaa			
Please read instructions on reverse be	United Sta				0060, Approval expires 05-31-98 OPP Identifier Number	
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	vironmental Prot	÷ .	Y 🗌 Amend	lment		
	Washington, D	C 20460	🛛 Other			
	Appl	ication for Pe	esticide - Sectio	n I		
1. Company/Product Number	· · · · · · · · · · · · · · · · · · ·		Product Manager		3. Proposed Classification	
64240-34		Richar	Richard Gebken		None Restricted	
4. Company/Product (Name)		PM#	PM#		None Restricted	
Combat Large Roach Bait]	7.03	10				
5. Name and Address of Applicant (Include ZIP Code)	6. Exp	edited Review. In	accordance wit	th FIFRA Section 3(c)(3)	
Combat Insect Control Syst			(b)(l), my product is sinitratic dentication composition and labeling			
c/o Henkel Consumer Goods I	nc.	10.	to:			
19001 N. Scottsdale Rd.		EPA R	leg. No	AR 2 1 2010		
Scottsdale, AZ 85255 NOTE: PLEASE SEND ALL COI	RESPONDENCE TO			• .		
"CONTACT POINT" LISTED B		Produ	ct Name			
Check if this is a new						
		Secti	on - II		······	
Amendment - Explain below.			Final printed lat	oels in response to	Agency letter dated	
Resubmission in response to	Agency letter dated		"Me Too" Applic			
Notification - Explain below	• •		Other - Explain			
Explanation: Use addition		sarv. (For Sect				
-		• •	GE & DISPOSAL	·	TICE 2007-4	
					6.10, 156.140, 156.144, 156.146, and	
					I that it is a violation of 18 U.S.C Sec.	
					ements of 40 CFR §§156.10, 156.140, ties under sections 12 and 14 of FIF	
150.144, 150.140 and 150.150, an	product may be in violat		on – III	ient action and penal		
		Sectio	511 - 111			
1. Material This Product Will Be F Child-Resistant Packaging	Vackaged In: Unit Packaging		Water Soluble Pac	kaging	2. Type of Container	
			Yvaler Soluble Pac	kaying	Metal	
No						
	If "Yes"	No. per	If "Yes"	No. per	Glass	
*Certification must	Unit Packaging w	/gt. container	Package wgt.	container	Paper	
be submitted					Other (Specify)	
3. Location of Net Contents Inform	nation 4. Siz	ze(s) Retail Contair	l ner	5. Location	of Label Directions	
	ontainer			On Label		
				On labelir	ng accompanying product	
6. Manner in Which Label is Affix		Lithograph	Other	•		
		Paper glued Stenciled				
			on – IV		- · · · · · · · · · · · ·	
1. Contact Point (Complete items	directly below for identi			essary to process	this application)	
Name Georgia Anastasiou - Lewi		Title			elephone No. (Include Area Code)	
122 C St. NW #740, Washin	gton DC 20001	Agent for Co	mbat Insect Conti		202-393-3903 ext. 19	
Looptic, that the statements i have		fication		and complete	6. Date Application	
I certify that the statements I have acknowledge that any knowingly f under applicable law.					(Stamped)	
2. Signature		3. Title	,	- ;; (333	
Ø			Agent for Combat Insect Control System			
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4. Typed Name		5. Date				
Georgia Anastasiou - Lewis	& Harrison, LLC		March 1, 2010	. ((ر د ر ر ر ر ر	
EPA Form 8570-1 (Rev. 8-94) Previ	ous editions are obsol	l	Whit	te- EPA File Copy		
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LEWIS & HARRISO

Consultants in Government Affairs

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

March 1, 2010

VIA COURIER

Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency One Potomac Yard, Room S4900 2777 S. Crystal Drive Arlington, VA 22202-4501

ATTENTION:	Richard Gebken		
	Product Manager #10		
SUBJECT:	Combat Insect Control Systems		
	Notification per PR Notice 2007-4 for the following products		
	Combat Ant Bait F1 (EPA Reg. No. 64240-30)		
	Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)		
	Combat ABF7 (EPA Reg. No. 64240-42)		
	Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)		
	Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)		

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

To support the notifications, enclosed please find the following documents for each product:

- 1. Application for Pesticide which includes the PR Notice 2007-4 certification;
- 2. One (1) copy of the label with changes highlighted; and,
- 3. Two (2) copies of the label.

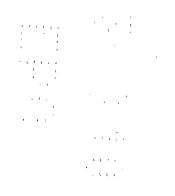
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,

Georgia anastasion

Georgia Anastasiou Agent for, Combat Insect Control Systems

cc: David Rickard (Combat)



Master Label, March 2010 (S&D Revised) EPA Reg. No. 64240-34 Combat Large Roach Bait F.03 Pa 1 of 6

NOTIFICATION

MAR 3 1 2010

MASTER LABEL

5

COMBAT_®

Approved ABNs: [Combat Quick Kill Formula 2], [Combat Source Kill Max R2]

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:

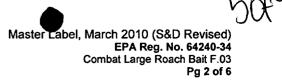
Hazards to Humans and Domestic Animals

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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency [or toll free number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

<u>Note to Reviewer</u>: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.

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 mad Recycled fiber [minimum% post consum [PLEASE RECYCLE EMPTY CARTO	er content].





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:

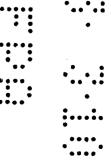
- 1. Roaches enter [the] bait station and eat the bait.
- 2. Roaches return to their nest and die.
- 3. Other roaches eat them and die creating a chain reaction.
- EASY TO USE
- NOTHING TO ACTIVATE
- NO VAPOR, FUMES, [MESS] OR ODOR

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].





Master Label, March 2010 (S&D Revised) EPA Reg. No. 64240-34 Combat Large Roach Bait F.03 Pg 3 of 6

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 c
Under refrigerator	In cu
Under stove	Near

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).

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 $1\frac{1}{2}$ 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.]



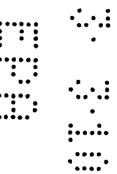
Master Läbel, March 2010 (S&D Revised) EPA Reg. No. 64240-34 Combat Large Roach Bait F.03 Pg 4 of 6

[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.]

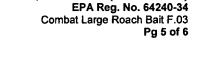
Claims for front or back

- 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

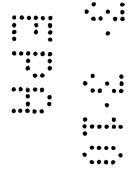


- See visible results within -or- in 48 hours
- 48 hour kill -or- action
- Fast acting -or- action formula
- [Delivers] fast killing results
- Provides maximum roach control for 3 months
- Starts working within hours and continues working
- Starts working in hours
- Kills roaches fast before they multiply for long-term control
- 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



Master Label, March 2010 (S&D Revised)





Master Label, March 2010 (S&D Revised) EPA Reg. No. 64240-34 Combat Large Roach Bait F.03 Pg 6 of 6

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:	
†CAS No. 120068-37-3	

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

CAUTION:

DISPOSAL: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency [or toll free number] 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)