

64240-34

3/17/2011

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

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MAR 17 2011

Combat Insect Control Systems  
c/o Lewis & Harrison  
122 C Street, N.W., Suite 740  
Washington, D.C. 20001

Subject: Amendment for Child-resistant Packaging Certification  
EPA Reg. No. 64240-34  
Submission dated October 26, 2010  
Decision No: 441593, S: 884635

Dear Ms. Anastasiou:

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 condition below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

- As a condition of this amendment, new confirmatory child-resistant packaging data conducted with at least nine bait stations must be submitted for the large roach bait stations, which demonstrate continued compliance with the standards of 40 CFR 157.32. These new data must be submitted to the Agency by July 1, 2011.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this action, please contact Rosanna Louie-Juzwiak at (703) 308-0037.

Sincerely,

Richard Gebken  
Product Manager 10, Insecticide Branch  
Registration Division (7505P)

Enclosure: Combat Large Roach Bait F.03 Label, Stamped *Accepted with Comments*

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

Master Label, March 17, 2011  
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**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
MAR 17 2011**

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

MASTER LABEL

# COMBAT®

## Large Roach Bait F.03

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: .....	99.97%
TOTAL.....	100.00%

†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 and before eating, drinking, chewing gum, using tobacco, or using the toilet.

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

***Note to Reviewer:*** 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.

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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)



[[The paperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_ %

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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].

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### 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 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).
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.]

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- 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

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- 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

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**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%
<hr/>	
TOTAL.....	100.00%
†CAS No. 120068-37-3	

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[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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[For Large Roaches]

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

NET WT 0.06 oz (1.75g)