

64240-34

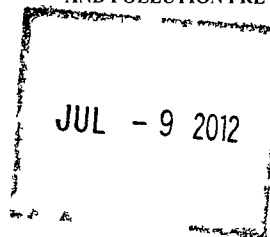
7/9/2012

1/9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION



Ms Georgia Anastasiou
Agent for Combat Insect Systems
Lewis & Harrison
122 C Street N W Suite 740
Washington DC 20001

Subject Label Notification(s) for Pesticide Registration Notice 98 10

Dear Ms Anastasiou

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98 10 dated June 26 2012 for the following product(s)

Combat Max Roach Killing Bait L Alternate Brand Name

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98 10 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.

Combat^o Large Roach Bait F 03 EPA Reg No 64240 34

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely

A handwritten signature in black ink, appearing to read "Richard J Gebken".

Richard J Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)



United States
Environmental Protection Agency
Washington DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide Section I

1 Company/Product Number 64240 34	2 EPA Product Manager Richard Gebken	3 Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Combat Large Roach Bait F 03	PM# 10	
5 Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc 19001 N Scottsdale Rd Scottsdale AZ 85255 <i>NOTE PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW</i> <input type="checkbox"/> Check if this is a new address		6 Expedited Review In accordance with FIFRA Section 3(c)(3) (b)(I) my product is similar or identical in composition and labeling to EPA Reg No <u> NOTIFICATION </u> Product Name <u> JUL - 9 2012 </u>

Section II

- Amendment Explain below
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- Me Too Application
- Notification Explain below
- Other Explain below

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

Notification of the Alternate Brand Name Combat Max Roach Killing Bait L

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 Georgia Anastasiou Lewis & Harrison LLC 122 C St NW #740 Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No (Include Area Code) 202 393 3903 ext 19
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 (Stamped)
2 Signature 	3 Title Agent for Combat Insect Control System	
4 Typed Name Georgia Anastasiou Lewis & Harrison LLC	5 Date June 26 2012	

LEWIS & HARRISON

122 C Street NW Suite 740
Washington DC 20001
telephone 202 393 3903
fax 202 393 3906

Consultants in Government Affairs

June 26 2012

HAND DELIVERED

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 10**

SUBJECT

**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 I submitting a notification to propose the following alternate brand name for the product Combat Large Roach Bait F 03 (EPA Reg No 64240 34)

Combat Max Roach Killing Bait L

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 a copy of the master label with the proposed brand name

If you have any questions please contact me at 202 393 3903 ext 19 or by email at georgia@lewisharrison.com

Sincerely



Georgia Anastasiou
Agent for
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

4/9

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 June 26 2012
EPA Reg No 64240 34
Combat Large Roach Bait F 03
Pg 1 of 6

MASTER LABEL

COMBAT®

Large Roach Bait F 03

Approved ABNs [Combat Quick Kill Formula 2] [Combat Source Kill Max R2]
Proposed ABN [Combat Max Roach Killing Bait L]

NOTIFICATION

For Large Roaches
Waterbugs & Palmetto Bugs

JUL - 9 2012

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.

Distributed by & ©2011 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)



5/7

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Combat Large Roach Bait F 03
Pg 2 of 6

[[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]

6/8

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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 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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Combat Large Roach Bait F 03
Pg 4 of 6

- 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

9/9

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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	99 97%
TOTAL	100 00%

†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 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 call] all the Combat Labs [Information] Helpline at 1 800 426 6228 [for more information]
[Questions or Comments? Call 1 800 426 6228]

Distributed by & ©2011 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)