

64240-34

2/5/2013

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

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 5, 2013

Ms. Georgia Anastasiou
Agent for Combat Insect Systems
Lewis and Harrison
122 C Street NW, Suite 740
Washington, DC 20001

Subject: Notification for Minor label Change
EPA Registration Number: 64240-34
Decision: 470999

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated September 18, 2012, for the abovementioned product. 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 regarding this letter, please contact Driss Benmhend at (703) 308-9525.

Sincerely,

for, [Signature]

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosures: Copy of Label Stamped "Notification"



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. _____ Product Name _____	

Section - II

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

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

Notification of minor changes to the label. 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:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
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"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____		

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 #505, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 19
Certification 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 <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date September 18, 2012	

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LEWIS & HARRISON

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs

September 18, 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**

Dear Mr. Gebken:


On behalf of Combat Insect Control Systems, I am submitting a notification for the product Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34). The purpose of this notification is to make minor revisions to the label. The revisions include addition of non-FIFRA language, clarifying which language is considered optional, moving the "Directions for Use" header to the appropriate section, addition of graphics, and minor changes to the marketing language.

In support of this submission enclosed please find the following documents:

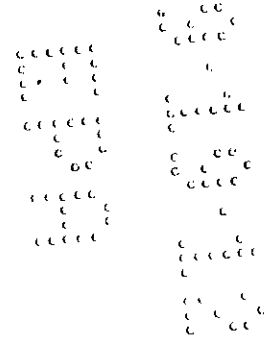
- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted;
- 3) Two (2) copies of the revised label; and,
- 4) PDF copy of the revised label.

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)

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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, September 17, 2012
EPA Reg. No. 64240-34
Combat Large Roach Bait F.03
Pg 1 of 8

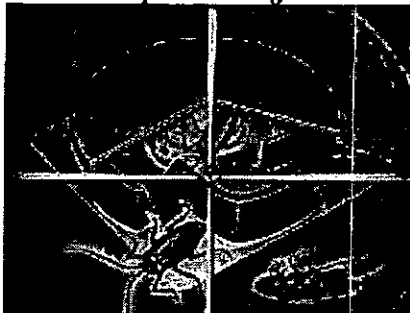
MASTER LABEL

COMBAT®

Large Roach Bait F.03

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

Optional image



NOTIFICATION

FEB 05 2013

[For Large Roaches [, Waterbugs & [and] Palmetto Bugs]]
[Large Roach]

ACTIVE INGREDIENT: Fipronil†	0.03%
<u>OTHER INGREDIENTS:</u>	<u>99.97%</u>
TOTAL.....	100.00%

†CAS No. 120068-37-3

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

CAUTION:

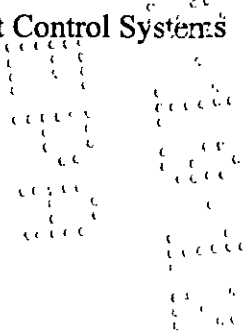
See precautionary statements on back – or – side panel.

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

EPA Reg. No. 64240-34
EPA Est. No. _____

[CONTAINS] 8 CHILD-RESISTANT BAIT STATIONS
TOTAL NET WT. 0.49 oz (14g)

PRECAUTIONARY STATEMENTS:
Hazards to Humans and Domestic Animals



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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 batch code will be printed on each bait station.}

[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.]

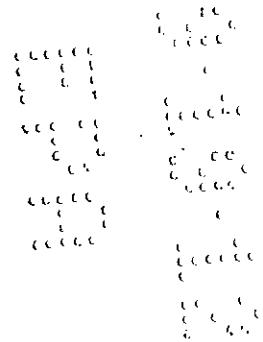
[Satisfaction guaranteed] [Combat] [Guaranteed to work] [or your money back][!]

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

Optional Henkel Quality statement for front or back or side panel:



[[The paperboard in] [this] [C]carton [contains] [is made from] _____% recycled fiber
[minimum _____% post consumer content].]
[PLEASE RECYCLE EMPTY CARTON]



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Master Label, September 17, 2012
EPA Reg. No. 64240-34
Combat Large Roach Bait F.03
Pg 3 of 8

[GENERAL INFORMATION]

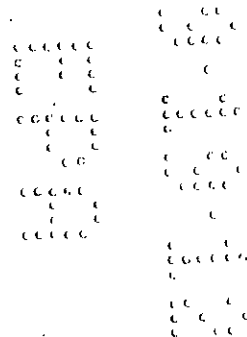
[THIS IS] [HOW] [Alternate Brand Name] [THIS PRODUCT] WORKS:

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® [Alternate Brand Name] 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.



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Master Label, September 17, 2012
EPA Reg. No. 64240-34
Combat Large Roach Bait F.03
Pg 4 of 8

DIRECTIONS FOR USE

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

APPLICATION INSTRUCTIONS

1. Use all 8 baits [at one time].
Break baits apart from plastic frame – or - Remove wrapper and separate bait stations from plastic frame.
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.]
3. Replace all [8] baits every 3 months, or sooner if roaches return [because roaches have probably eaten all of the bait inside.]

[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.]

[Note to reviewer: Label may include these graphic depictions of recommended placement locations.]



Optional image



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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 -

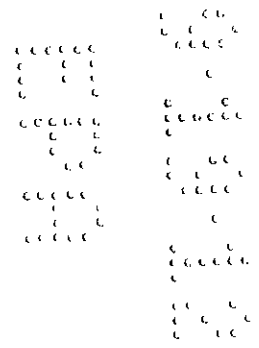
[The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).]

[FOR LARGE ROACHES[, WATERBUGS & PALMETTO BUGS:]]

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

Large, 1" to 1 1/2 " Cockroach Habits:]

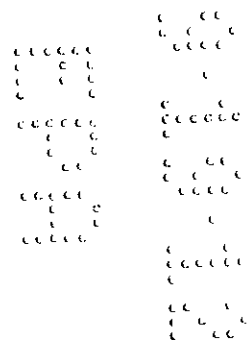
[Primarily live and breed outdoors and enter homes in search of food. For effective control, bait stations should be placed where roaches can enter your home.]



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Optional Claims for front or back

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

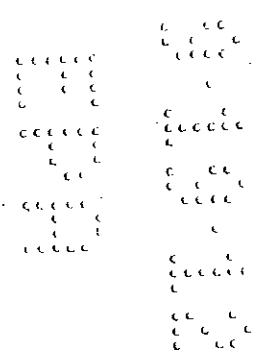


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- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops ***-or-*** kills roaches before they become a problem
- Protects ***-or-*** defends your home against roaches
- Patented [action] formula ***-or-*** Ingredient
- Special 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 [or other alternate brand names]



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Master Label, September 17, 2012
EPA Reg. No. 64240-34
Combat Large Roach Bait F.03
Pg 8 of 8

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%
<u>OTHER INGREDIENTS:</u>	<u>99.97%</u>
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 the] Combat Labs [Information] Helpline [:] [at] 1-
800-426-6228 [for more information].
[Questions or Comments? Call [toll free] 1-800-426-6228.]

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

EPA Reg. No. 64240-34
EPA Est. No. _____

[[For] Large Roach[es]]

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS.

NET WT 0.06 oz (1.75g)