

64240-35

2/2/2011

1 of 9



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Georgia Anastasiou, Agent
Combat Inset Control Systems
c/o Henkel Consumer Goods Inc.
1900 N. Scottsdale Road
Scottsdale, AZ 85255

FEB - 2 2011

Subject: Label Notification(s) for Pesticide Registration PR 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 August 9, 2010 for:

EPA Registration Number: 64240-35 Combat Roach Gel

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-2007-4. 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 non-refillable 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 Melody Banks on 703 305-5413.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez", written over a horizontal line.

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7504P)

2009



United States
 Environmental Protection Agency
 Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 64240-35	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Roach Gel	PM# 11	
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 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <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.
- 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 TO UPDATE STORAGE & DISPOSAL PER PR NOTICE 2007-4

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be 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 August 9, 2010	

30f9 (MS)

LEWIS & HARRISON

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

Consultants in Government Affairs

August 9, 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: Mark Suarez
Product Manager, Team 11

SUBJECT: Combat Insect Control Systems
Notification per PR Notice 2007-4 for the following products
Combat Fire Ant Killer (EPA Reg. No. 64240-1)
Combat Ant Killing System (EPA Reg. No. 64240-3)
Combat Roach Killing System I (EPA Reg. No. 64240-4)
Combat Ant Control Formula System II (EPA Reg. No. 64240-5)
Combat Superbait Brand Granular Ant Killer (EPA Reg. No. 64240-25)
Combat Regular Roach Bait 0.5% HM (EPA Reg. No. 64240-27)
Combat Roach Gel (EPA Reg. No. 64240-35)

Dear Mr. Suarez:

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.

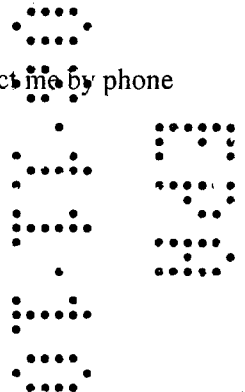
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat)



4099

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***

[Bracketed information is optional text.]

Highlighted text is new!

Pg 1 of 6

Master Label, August 2010

EPA Reg. No. 64240-35

Combat Roach Gel

COMBAT® Roach Gel

ACTIVE INGREDIENT: Hydramethylnon†.....2.15%
OTHER INGREDIENTS:97.85%
†CAS No. 67485-29-4

CAUTION: KEEP OUT OF REACH OF CHILDREN

USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS

See precautionary statements – or – precautions on end – or – side – or – back – or –
bottom panel.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

FIRST AID:

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. **IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. Combat [Information] Helpline: 1-800-426-6228.

Distributed by & ©2010 Combat Insect Control Systems
19001 N. Scottsdale Rd. Scottsdale, AZ 85255

EPA Reg. No. 64240-35
EPA Est. No. _____

Combat GUARANTEED to work [OR YOUR MONEY BACK] [MADE IN USA]

CONTAINS ___ [pre-filled plastic], dispenser[s] – or – reservoir[s] – or – syringe[s]

TOTAL NET WT. _____

Large Size

5089

Note: *Bold, Italicized text is information for the reader and is not part of the label.*

[Bracketed information is optional text.]

Highlighted text is new!

Pg 2 of 6

Master Label, August 2010

EPA Reg. No. 64240-35

Combat Roach Gel

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 [THE] COMBAT[®] ROACH GEL WORKS:

1. Dispense – or – Apply gel near observed – or – suspected roach nesting areas.
2. Roaches eat the gel and die in the nest.
3. Other roaches eat them and die [, creating The Domino Effect[™]] [, which eliminates roaches and the eggs they carry].

[Tips for Best Results:

- Use many small placements, not a few large ones
- Use the entire tube at the same time
- Clean greasy or dirty surfaces before placement
- In more open areas, such as walls and floors, inside cabinets, and near food, also use Combat SuperBait Roach Baits for maximum roach control]

Claims for front or back

- Egg Stopping Gel
- This product can be applied behind appliances and into cracks and crevices, right into roach nesting areas where pregnant – or – egg bearing roaches are hiding
- Complete control by targeting nests and eliminating eggs
- This product controls by targeting the nest and eggs
- Roach & Egg Control Gel
- Kills pregnant roaches where they live – or – hide
- Targeted roach [and egg] control
- For cracks and crevices
- For hard to reach places [such as cracks and crevices]
- Kills roaches and the eggs they carry
- Gets roaches where they enter your home
- Can be applied out of reach of children and pets
- Can be applied in hidden – or – small – or – hard to reach places so it's out of sight and your roach problem out of mind
- Kills existing roaches and stops new roaches from hatching
- Continued use keeps roaches under control
- Guaranteed to work or your money back
- Targets the nest and kills eggs
- No fumes or vapor

Large Cockroaches:

- Even kills roaches resistant to pyrethroids and organophosphates
- Kills roaches and the eggs they carry
- Guaranteed to work or your money back
- This product may be used as a spot or crack and crevice treatment for the indoor and outdoor control of cockroaches.
- Pest population reduction will be apparent within a week or less

6009

Small Cockroaches:

- Kills Eggs
- Breaks the Roach Life Cycle
- Eggstopping ingredient – or – formula
- Prevents Egg Production
- Prevents Roach Reproduction
- Patented Action EGG Control
- Sterilizes female roaches
- As The Domino Effect™ spreads through the roach population, most roaches are kills, and still others lose their ability to produce eggs
- This product’s patented action formula kills roaches and the eggs they carry
- As The Domino Effect™ spreads through the roach population, roaches that are affected either die or lose their ability to produce eggs
- [This product] offers – or – provides complete roach control
- [This product] offers – or – provides maximum roach control
- Controls roaches two ways, by killing adults and preventing reproduction in others
- [This product] attacks – or – disrupts the reproductive system – or – cycle of roaches
- Kills roaches and the eggs they carry 24 hours a day, 7 days a week
- Kills roaches and the eggs they carry while you sleep
- Kills roaches and eggs while you sleep
- Kills roaches and eggs 24 hours a day, 7 days a week
- Kills roaches and the eggs they carry without vapors or fumes
- Controls roaches by targeting the nest and the eggs they carry

Combat’s patented action formula provides complete roach control by killing roaches and the eggs they carry. This gel can be injected – or – applied behind appliances and in cracks and crevices, right near the places where roaches make their nests or enter your home. Combat [also] allows you to place bait in many more locations in your home, which means more roaches find and eat the bait, and more roaches die.

Combat targets roach nesting areas – or – places where roaches enter your home.

Combat’s patented action formula provides complete roach control by targeting roach nesting areas. This gel can be injected behind appliances and in cracks and crevices, right near nesting areas where egg-bearing – or – pregnant roaches are hiding. Combat also allows you to place bait in many more locations in your home, which means more roaches contact – or – find and eat the bait, and more roaches die.

Product is easy to use: Targets the nest. Combat gel can be injected – or – applied behind appliances and in cracks and crevices near roach nesting areas which are the source of roach problems.

Combat® Roach Gel may be used as a spot or crack and crevice treatment for the indoor and outdoor control of cockroaches.

70f9

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***

[Bracketed information is optional text.]

Highlighted text is new.

Product may stain textiles and clothing.

For more information, call the Combat® Information Helpline at 1-800-426-6228. – or -
Questions? Comments? Please call 1-800-426-6228

GENERAL PRECAUTIONS AND RESTRICTIONS

Use only in areas inaccessible to children and pets.

- Product may stain textiles and clothing.
- Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as this may cause the bait to become repellent.
- Do not use sprays or foggers around gel since they can contaminate the gel and reduce effectiveness. Do not apply gel to areas that are routinely washed, such as counter tops, as gel will be removed or diluted and spread onto the surface.
- For Indoor Use: Do not use this product in or on electrical equipment where a possibility of shock hazard exists.
- [Do not spray or smoke around gel bait.]
- Do not treat food/feed preparation surfaces.

APPLICATION INSTRUCTIONS

1. To apply gel: Remove cap from tip, touch tip to surface and depress plunger. Gel can be applied as spots or in a line along cracks or crevices. Recap after use.
 2. Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as this may cause the bait to become repellent.
- or -
2. [For best results,] make – or – place many spots or dabs of gel near areas of roach traffic and suspected nesting areas. Gel can be placed in cracks, crevices, corners and any out of the way place in the house [, such as under and behind kitchen appliances, along baseboards, under sinks, in pantry, around pipes and water heater and in the garage and attic.] [Numerous small placements will provide faster control than fewer large spots.] For thorough control, use entire tube at same time.
 3. Inspect placements and reapply as needed: The gel will remain attractive to roaches and keep working for up to 3 months. Inspect gel placements after 1 month and reapply when you can no longer see the gel. Reapply after 3 months. Clean up remaining gel with a damp cloth and throw it away.
- or -
3. [The gel will remain attractive to roaches and keep working for 3 months.] Inspect gel after one month and reapply if it is no longer visible. Refresh with a new application after 3 months. Gel cleans up with a damp paper towel. Discard towel after use.
 4. [A visual inspection of bait placements is recommended at one month after the initial treatment. Reapply when bait is no longer visibly present, according to the remaining level of infestation.]

The label may include illustrations of suggested application placement sites.

8049

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***

[Bracketed information is optional text.]

Highlighted text is new

For indoor use: Do not place gel – or – bait in locations that are routinely – or – frequently washed, as gel – or – bait will be removed by washing. Do not treat food preparation surfaces.

For outdoor use: Place gel in areas where roaches may nest or breed [near your house or garage]. Apply gel to potential places where roaches may enter your home, such as eaves, sills, and expansion joints. Apply gel in protected areas whenever possible. [Extreme heat or cold, direct sunlight and water may reduce [the residual] effectiveness.]

[You will notice fewer roaches within a week.] – or – [Pest population reduction will be apparent within a week or less.]

[Apply gel in 1-4 dime-sized ($\frac{1}{4}$ – $\frac{1}{2}$ g) spots or a 3” – 12” line – or – bead – or – strip per square yard. Keep exposed – or – applied gel away from open food and food contact surfaces. Gel placements should be at or near observed roach gathering areas – or – harborages or aggregation areas, such as corners, areas of movement or cracks and crevices. Numerous smaller placements will provide faster control than few larger spots, especially for German cockroach control. Combat Roach Gel may be used as a spot or crack and crevice treatment for the indoor and outdoor control of cockroaches. Do not treat food/feed preparation surfaces.]

[The lower application rate – or – level should be used for low to moderate infestations or - retreatments and the higher rate – or – level for more severe infestations or where the population occurs in inaccessible areas, such as in walls.]

STORAGE AND DISPOSAL

STORAGE: Store in a 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

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.



[[The paperboard in this] [C]carton [contains] [is made from] _____%
Recycled fiber [minimum _____% post consumer content].]

[PLEASE RECYCLE EMPTY CARTON]

9049

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***

[Bracketed information is optional text.]

Highlighted text is new.

Pg 6 of 6

Master Label, August 2010

EPA Reg. No. 64240-35

Combat Roach Gel

UNIT LABEL

COMBAT® Roach Gel

Refer to outer box for complete Directions for Use.

ACTIVE INGREDIENT: Hydramethylnon†2.15%

OTHER INGREDIENTS:97.85%

†CAS No. 67485-29-4

KEEP OUT OF REACH OF CHILDREN

CAUTION:

USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

FIRST AID:

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. **IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Have the product container or label with you when calling a poison control center or doctor or] going for treatment. Combat [Information] Helpline: 1-800-426-6228.

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.

For more information, call the Combat® [Labs] Information Helpline at 1-800-426-6228. – or – Questions? Comments? Please call 1-800-426-6228 – or – Call the Combat® Helpline at 1-800-426-6228 for information.

Distributed by & ©2007 Combat Insect Control Systems
19001 N. Scottsdale Rd. Scottsdale, AZ 85255
NET WT

EPA Reg. No. 64240-34
EPA Est. No. _____
[U.S. Patent Nos. _____]

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS