



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 21 2006

Combat Insect Control Systems
c/o Mr. Robert Brennis, Agent
Lewis and Harrison
122 C St. NW, Suite 740
Washington, DC 20001

Dear Mr. Brennis:

Subject: Combat Quick Kill Roach Killing Gel
EPA Reg. No. 64240-45
Submission dated 11/2/06

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 comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

As stated in the letters dated June 27, 2006 and November 17, 2006, the alternate brand names which incorporate the heightened efficacy claim "Platinum" are not acceptable unless they are qualified as a brand name as in "Combat Quick Kill Platinum brand Roach Killing Gel".

On page 2 of the label and on the syringe label, revise the sentence which follows the signal word "Caution" to read as follows:
Do not apply gel to surfaces where food is handled or prepared. Do not contaminate food or food utensils.

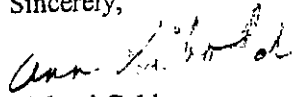
If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

for Ann Sibold
Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

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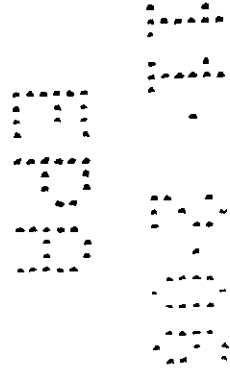
Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

EPA Reg. No. 64240-45, Combat Quick Kill Roach Killing Gel, Page 1 of 4

NOV 21 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
64240-45



**QUICK KILL [PLATINUM]
ROACH KILLING GEL**

**USE ONLY IN AREAS INACCESSABLE TO CHILDREN AND PETS
KEEP OUT OF REACH OF CHILDREN**

CAUTION:

See side and back panel for additional precautionary statements and directions

ACTIVE INGREDIENT: Fipronil*.....0.01%

OTHER INGREDIENTS:.....99.99%

*CAS No. 120068-37-3

Contains: 1 Syringe

TOTAL NET WT 0.42 OZ (12g) -or- 1.05 OZ (30g) -or- 2.1 OZ (60g)

EPA Reg. No: 64240-45. EPA Est. No. 071106-GA-001.

DISTRIBUTED BY ©2007 COMBAT INSECT CONTROL SYSTEMS, SCOTTSDALE,
ARIZONA 85254. MADE IN USA.

Product may stain textiles and clothing.

**PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS.**

CAUTION: Keep gel away from foods and food contact surfaces. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID: IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice. IF IN EYES: Hold eye open, rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry area out of reach of children.

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency [or 1-800-CLEANUP].

If you have questions regarding the use of this product, please call the Combat® helpline at 1-800-426-6228 for information.

DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not use for control of insects other than those listed on this label.

[COMBAT® [Quick Kill] [Platinum] Roach Killing Gel may be used as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas.]

GENERAL DIRECTIONS:

Application rate is dependent on level of infestation and species to be controlled. Gel can be applied only as spots or as a bead [-or- in a line -or- in a strip] in cracks and crevices. The lower application rate should be used for low to moderate infestations or re-treatments, and the higher rate for more severe infestations or where the population occurs in inaccessible areas, such as in walls. Gel placements should be made at or near areas of roach traffic and suspected nesting areas, such as corners, cracks and crevices. Numerous smaller placements will provide faster control than fewer larger spots, especially for German cockroach control.

{This chart is optional}

LEVEL OF INFESTATION OR SPECIES	APPLICATION RATE (PER SQ. YD.)
MODERATE INFESTATIONS OR RE-TREATS FOR GERMAN OR BROWN-BANDED ROACHES	1 - 2 SPOTS (DIME-SIZED) OR 1½" - 3" BEAD (LINE/STRIP)
SEVERE OR HEAVY INFESTATIONS FOR GERMAN OR BROWN-BANDED ROACHES	2 - 4 SPOTS (DIME-SIZED) OR 3" - 6" BEAD (LINE/STRIP)
LARGE ROACHES SUCH AS AMERICAN SMOKEY-BROWN OR ORIENTAL	

Do not apply gel to areas that have recently been sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent. Do not apply gel to surfaces where food is handled or prepared. Do not contaminate food or utensils with gel.

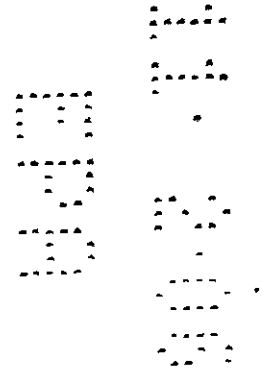
FOR INDOOR USE:

1. To apply gel: Remove cap from tip, touch tip to surface and depress plunger. Gel can be applied only as spots or in a bead [-or- line -or- strip] along cracks or crevices. For first application, apply gel in 4 dime-sized spots or several 1½ to 6-inch beads [-or- lines -or- strips] per square yard. Recap tube after use.
2. 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 spots where roaches occur.
3. Inspect gel after one month and reapply if no longer visible. Refresh with a new application after 3 months. Gel cleans up with a damp paper towel. Discard towel after use.

FOR OUTDOOR USE (adjacent to home or structure): Place gel in areas adjacent to structures where roaches may nest or breed. Apply gel to places where roaches may enter your home, such as eaves, sills and expansion joints. Apply gel in protected areas whenever possible, as direct sunlight and water will reduce the residual effectiveness. Inspect gel after one month and reapply if no longer visible. Refresh with a new application after 3 months.

Optional Label Claims:

- Easy to use
- No vapors or fumes
- For hard-to-reach places such as cracks and crevices
- Fast control of even large roaches
- Long residual action
- Ideal for use with COMBAT® bait stations
- Guaranteed to work or your money back
- Starts working in hours
- COMBAT® [Platinum] [Quick Kill] Roach Killing Gel kills roaches fast.
- Roaches eat the gel and die in the nest.
- COMBAT® [Quick Kill] [Platinum] Roach Killing Gel has a specific combination of roach food attractants and a fast-acting active ingredient to create a highly effective tool in the fight against roaches.
- The gel attracts roaches in search of food and water to the bait.
- Roaches ingest the bait and return to die in their nest.
- Advanced [food] formula*
 - * versus previous gel formula.



Please recycle empty carton.

Guaranteed to Work or your money back!

Call the Combat® helpline at 1-800-426-6228 for information.

Syringe Label for :
COMBAT® (PLATINUM)
(QUICK KILL) ROACH KILLING GEL
 Syringe sizes: [0.42 OZ (12 g)] -or- [1.05 OZ (30 g)] -or- [2.1 OZ (60 g)]

(This syringe label is approximately 100% of the size for the 30g syringe.
 Actual size will be adjusted to fit each of the 3 different sizes of syringe.)

NOTE: DO NOT REMOVE THIS LABEL

SEE CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS
LEER LAS INSTRUCCIONES Y PRECAUCIONES EN EL CARTON

KEEP OUT OF REACH OF CHILDREN AND PETS
 Use only in areas inaccessible to children and pets

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS MANTENGA EL PRODUCTO ALEJADO DEL ALCANCE DE LOS NIÑOS. USAR SOLO EN AREAS INACCESIBLES A NIÑOS Y MASCOTAS. PRECAUCIONES RIESGOSO PARA PERSONAS Y ANIMALES DOMÉSTICOS

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COMBAT®
QUICK KILL [PLATINUM] ROACH KILLING GEL

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Questions or Comments call 1-800-426-6228
 DIST. BY ©2008 COMBAT INSECT CONTROL SYSTEMS SCOTTSDALE, ARIZONA 85254 MADE IN USA.
 EPA Reg. No. 64240-45, EPA Est. No. 071106-GA-001

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