



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Ana Rodriquez-Koster
Agent for Combat Insect Control Systems
Lewis & Harrison, LLC
122 C Street, N.W. Suite #740
Washington, DC 20001

OCT 10 2008

RE: Notification to delete Seven Alternate Brand Names
EPA Registration Number: 64240-45
Date of Submission: August 26, 2008

Dear Ms. Rodriquez-Koster:

This letter is to acknowledge your request to the Agency in a letter dated August 26, 2008 to delete seven alternate brand names: “Combat Platinum Roach Killing Gel,” “Combat Quick Defense Roach Killing Gel,” “Combat Plus Quick Defense Roach Killing Gel,” “Combat Precision Roach Killing Gel,” “Combat Plus Precision Roach Killing Gel and “Combat Precision Kill Roach Killing Gel. Our records have been updated to reflect this change.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2/10



EPA

United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other - Notification

OPP Identifier Number
265394

Application for Pesticide - Section I

| | | | | | |
|---|--|--|--|---|--|
| 1. Company/Product Number 64240-45 | | 2. EPA Product Manager Richard Gebken | | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted | |
| 4. Company/Product (Name) Combat Quick Kill Roach Killing Gel | | PM# 10 | | | |
| 5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 15101 N. Scottsdale Road Scottsdale, AZ 85254-2199 <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: NOTIFICATION EPA Reg. No. _____ Product Name OCT 10 2008 | | | |

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 PER PR NOTICE 98-10 TO DELETE SEVEN ALTERNATE BRAND NAMES. SEE COVER LETTER FOR DETAILS

This notification is consistent with the provisions of PR Notice 98-10 and 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 subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: Ana Rodriguez-Koster Date: 8/26/08

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 | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| *Certification must be submitted | | If "Yes" Unit Packaging wgt. No. per container | If "Yes" Package wgt. No. per container | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| 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 Ana Rodriguez-Koster - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001 | | Title Agent for Combat Insect Control Systems | | Telephone No. (include Area Code) 202-393-5903 ext. 17 | |
| 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 <u>Ana Rodriguez-Koster</u> | | 3. Title Agent for Combat Insect Control System | | | |
| 4. Typed Name Ana Rodriguez-Koster | | 5. Date 8/26/2008 | | | |

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

August 26, 2008

HAND DELIVERED

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

**ATTENTION: Richard Gebken
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems
Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)
Notification per PR Notice 98-10 to Delete Seven Alternate Brand Names**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), I am submitting this Notification to delete seven Alternate Brand Names that were recently submitted to the Agency for the product, **Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)**. The seven Alternate Brand Names that Combat wants to delete from the product's registration are the following: "Combat Platinum Roach Killing Gel," "Combat Quick Defense Roach Killing Gel," "Combat Plus Quick Defense Roach Killing Gel," "Combat Precision Roach Killing Gel," "Combat Plus Precision Roach Killing Gel," "Combat Precision Kill Roach Killing Gel," and "Combat Plus Precision Kill Roach Killing Gel."

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 revised Master Label that no longer includes these Alternate Brand Names.

Thank you for your assistance with this submission. If you have any questions, please call me at 202-393-3903 ext. 17 or e-mail me at alkoster@lewisharrison.com

Sincerely,



Ana Rodriguez-Koster
Agent for Combat Insect Control Systems

cc: David Rickard, Combat Insect Control Systems

4/10

Note: ***Bold, italicized text is information for the reviewer and is not part of the label.***
[Bracketed information is optional text.]
Underlined text is new.

EPA Reg. No. 64240-45, Combat Quick Kill Roach Killing Gel, Page 1 of 5

COMBAT[®] QUICK KILL ROACH KILLING GEL

Alternate Brand Names:

Combat[®] Platinum Brand Roach Killing Gel

Only when co-packed with EPA Reg. No. 64240-33 will the following Alternate Brand Names be used:

Combat[®] Plus Brand Platinum Brand Roach Killing Gel

Combat[®] Plus Platinum Roach Killing Gel

Combat[®] Plus Brand Quick Kill Roach Killing Gel

Approximate position of approved marketing claims & bursts

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

NOTIFICATION

CAUTION:

OCT 10 2008

See side and back panel for additional precautionary statements and directions

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

OTHER INGREDIENTS:.....99.99%

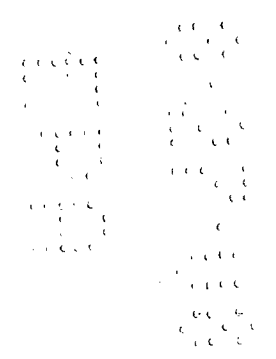
*CAS No. 120068-37-3

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 ©2008 COMBAT INSECT CONTROL SYSTEMS, SCOTTSDALE,
ARIZONA 85254. MADE IN USA.



Note: Bold, italicized text is information for the reviewer and is not part of the label.
[Bracketed information is optional text.]
Underlined text is new.

5/10

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.

Faint, illegible text or markings in the bottom right corner of the page.

6/10

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

[Bracketed information is optional text.]

Underlined text is new.

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] [*Alternate Brand Name*] 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.

Note: Bold, italicized text is information for the reviewer and is not part of the label.
[Bracketed information is optional text.]
Underlined text is new.

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® [*Alternate Brand Name*] [Quick Kill] Roach Killing Gel kills roaches fast.
- Roaches eat the gel and die in the nest.
- COMBAT® [Quick Kill] [*Alternate Brand Name*] 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.

Note: Bold, italicized text is information for the reviewer and is not part of the label.
[Bracketed information is optional text.]
Underlined text is new.

EPA Reg. No. 64240-45, Combat Quick Kill Roach Killing Gel, Page 5 of 5

Syringe Label for:
COMBAT QUICK KILL ROACH KILLING GEL
Alternate Brand Names:
Combat® Platinum Brand Roach Killing Gel

Only when co-packed with EPA Reg. No. 64240-33 will the following Alternate Brand Names be used:

Combat® Plus Brand Platinum Brand Roach Killing Gel
Combat® Plus Platinum Roach Killing Gel
Combat® Plus Brand 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.

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.

COMBAT® QUICK KILL ROACH KILLING GEL
[Alternate Brand Name]

Product may stain textiles and clothing.

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

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

OTHER INGREDIENTS:.....99.99%

*CAS NO. 120068-37-3

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



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other - Notification

OPP Identifier Number
265394

Application for Pesticide - Section I

| | | |
|---|--|---|
| 1. Company/Product Number 64240-45 | 2. EPA Product Manager Richard Gebken | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Combat Quick Kill Roach Killing Gel | PM# 10 | |
| 5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 15101 N. Scottsdale Road Scottsdale, AZ 85254-2199 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.
- 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 SEVEN (7) ALTERNATE BRAND NAMES in Accordance With PR Notice 98-10. See Cover Letter for Details.

This notification is consistent with the provisions of PR Notice 98-10 and 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 subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Signature: *Ana Rodriguez-Koster*

Date: 7/23/08

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 | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| *Certification must be submitted | | If "Yes" Unit Packaging wgt. | No. per container | If "Yes" Package wgt. | No. per container |
| 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 Ana Rodriguez-Koster - 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. 17 |
| 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>Ana Rodriguez-Koster</i> | 3. Title Agent for Combat Insect Control System | |
| 4. Typed Name Ana Rodriguez-Koster | 5. Date 7/23/2008 | |

10/10

LEWIS & HARRISON

Consultants in Government Affairs

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

July 23, 2008

HAND DELIVERED

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Richard Gebken
Product Manager, Team 10

SUBJECT: Combat Insect Control Systems
Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)
Notification per PR Notice 98-10: Alternate Brand Names

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), I am submitting a Notification to propose seven (7) alternate brand names for the product, **Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)**. The seven alternate brand names for this product are the following:


- "Combat Platinum Roach Killing Gel"**
- "Combat Quick Defense Roach Killing Gel"**
- "Combat Plus Quick Defense Roach Killing Gel"**
- "Combat Precision Roach Killing Gel"**
- "Combat Plus Precision Roach Killing Gel"**
- "Combat Precision Kill Roach Killing Gel"**
- "Combat Plus Precision Kill Roach Killing Gel"**

Please note that the names **"Combat Plus Quick Defense Roach Killing Gel,"** **"Combat Plus Precision Roach Killing Gel,"** and **"Combat Plus Precision Kill Roach Killing Gel"** will only be used when the product is co-packed with the registered product, Combat Small Roach Bait F.03 (EPA Reg. No. 64240-33). As a result, Combat understand that these alternate brand names should not trigger any concerns for heightened efficacy claims given that they will only be used when they are co-packed with the additional registered product.

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.

Thank you for your assistance with this submission. If you have any questions, please call me at 202-393-3903 ext. 17 or e-mail me at alkoster@lewisharrison.com

Sincerely,


Ana Rodriguez-Koster
Agent for Combat Insect Control Systems

cc: David Rickard, Combat Insect Control Systems