

64240-45

6/26/2009

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN 26 2009

Ms. Georgia Anastasiou
Lewis & Harrison, LLC
For Combat Control Systems
122 C. Street NW # 740
Washington, D.C. 20001

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Alternate Brand Names "Combat Defense System Brand Source Kill
Max3" and Combat Source Kill MaxR3"
EPA Reg. 64240-45
Application Dated May 22, 2009

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 05/22/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) 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, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

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

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

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

COMBAT® QUICK KILL ROACH KILLING GEL

Approximate position of approved marketing claims & bursts

Current ABN: [Combat Platinum Brand Roach Killing Gel]

Proposed ABN: [Combat Source Kill Max R3]

Proposed ABN: [Combat Defense System Brand Source Kill Max3]

**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%

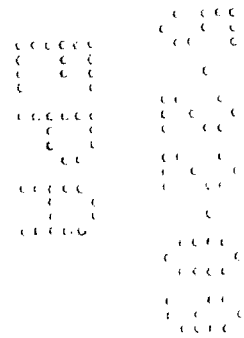
*CAS No. 120068-37-3

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. _____.

DISTRIBUTED BY ©2009 COMBAT INSECT CONTROL SYSTEMS, SCOTTSDALE,
ARIZONA 85255. MADE IN USA.



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[Bracketed information is optional text.]

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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.

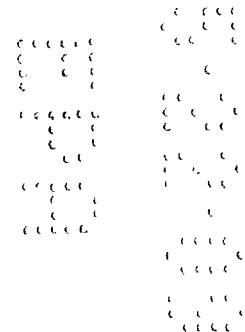
STORAGE: Store in a cool, dry area out of reach of children.

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.



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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.

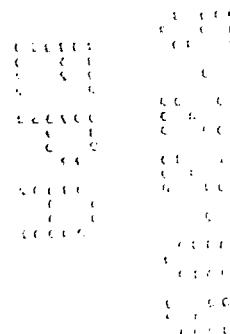
Optional Label Claims:

- 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.



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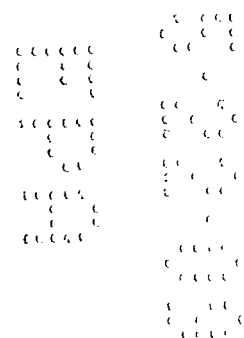
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Syringe Label for:
COMBAT QUICK KILL ROACH KILLING GEL

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 ©2009 COMBAT INSECT CONTROL SYSTEMS SCOTTSDALE, ARIZONA 85255 MADE IN USA.
EPA Reg. No. 64240-45, EPA Est. No. _____
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)]



NOTIFICATION

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