

64240-45

5/21/2010

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 21, 2010

Ms. Georgia Anastasiou
Combat Insect Control Solutions
c/o N. Scottsdale Road
Scottsdale, AZ 85225

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Anastasiou:

This letter replaces EPA's letter dated March 31, 2010 to correct the name of the product Combat Quick Kill Roach Killer Gel (EPA Reg. No. 64240-45) to Combat Quick Kill Roach Killing Gel.

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 2007-4 dated March 1, 2010 for the following product(s):

- | | |
|--|------------------------------|
| Combat Ant Bait F1 | EPA Reg. No. 64240-30 |
| Combat Large Roach Bait F.03 | EPA Reg. No. 64240-34 |
| Combat ABF7 | EPA Reg. No. 64240-42 |
| Combat Quick Kill Roach Killing Gel | EPA Reg. No. 64240-45 |
| Combat QK Roach Killing Gel F45 | EPA Reg. No. 64040-63 |

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 nonrefillable 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 Regina Foushee'-Smith at 703-605-0780

Sincerely,

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2009

MAR 31 2010

Ms. Georgia Anastasiou
Combat Insect Control Systems
c/o Henkel Consumer Goods Inc.
19001 N. Scottsdale Rd.
Scottsdale, AZ 85225

Subject: Label Notification(s) for Pesticide Registration 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 March 1, 2010 for the following product(s):

Combat Ant Bait F1 (EPA Reg. No. 64240-30)
Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)
Combat ABF7 (EPA Reg. No. 64240-42)
Combat Quick Kill Roach Killer Gel (EPA Reg. No. 64240-45)
Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)

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-98-10. 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 nonrefillable 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 Regina Foushee'-Smith at 703-605-0780.

Sincerely,

A handwritten signature in cursive script that reads "Richard J. Gebken".

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

3099

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

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. 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: <div style="text-align: center; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. <u> MAR 3 1 2010 </u> Product Name _____	

Section - II

- | | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> 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:				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 <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
*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"/> 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 <div style="text-align: center; font-weight: bold; font-size: 1.2em;">(Stamped)</div>
2. Signature <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date March 1, 2010	

40f9

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

March 1, 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: **Richard Gebken**
 Product Manager #10

SUBJECT: **Combat Insect Control Systems**
 Notification per PR Notice 2007-4 for the following products
 Combat Ant Bait F1 (EPA Reg. No. 64240-30)
 Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)
 Combat ABF7 (EPA Reg. No. 64240-42)
 Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)
 Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)

Dear Mr. Gebken:

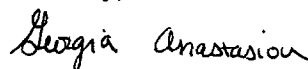
On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

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.

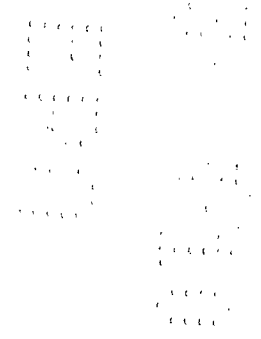
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat)



5099

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, March 2010 (S&D Revised)
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 1 of 5

COMBAT[®] QUICK KILL ROACH KILLING GEL

Approximate position of approved marketing claims & bursts

Approved Alternate Brand Names:

- [Combat Platinum Brand Roach Killing Gel]
- [Combat Source Kill Max R3]
- [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%

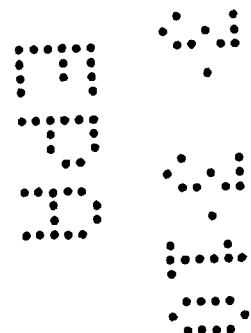
*CAS No. 120068-37-3

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.



6099

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.

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.

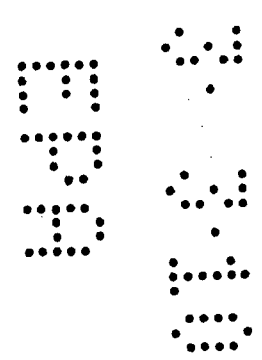
STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

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

DISPOSAL: If empty: 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 [or toll free number] 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.*

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



7 of 9

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

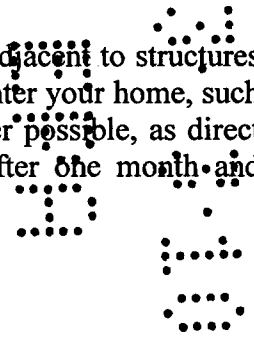
LEVEL OF INFESTATION OR SPECIES	APPLICATION RATE (PER SQ. YD.)
MODERATE INFESTATIONS OR RE-TREATS FOR GERMAN OR BROWN-BANDED ROACHES	1 - 2 SPOTS (DIME-SIZED) OR 1½" - 3" BEAD (LINE/STRIP)
SEVERE OR HEAVY INFESTATIONS FOR GERMAN OR BROWN-BANDED ROACHES	2 - 4 SPOTS (DIME-SIZED) OR 3" - 6" BEAD (LINE/STRIP)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



8 of 9

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Master Label, March 2010 (S&D Revised)
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 4 of 5

Optional Label Claims:

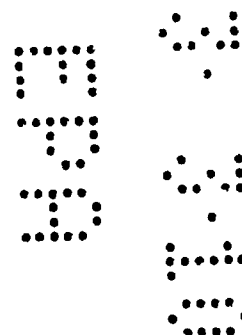
- Easy to use
- No vapors or fumes
- For hard-to-reach places such as cracks and crevices
- Fast control of even large roaches
- Long residual action
- Ideal for use with COMBAT® bait stations
- Guaranteed to work or your money back
- Starts working in hours
- COMBAT® [*Alternate Brand Name*] [Quick 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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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:** 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.

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)]

