

64240-45

12/21/2011

1029



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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

NOTIFICATION

DEC 21 2011

Georgia Anastasiou
Agent for Combat Insect Control Systems
c/o Lewis and Harrison, LLC
122 C Street, NW, Suite 740
Washington, DC 20001

Subject: Application for Pesticide Notification
EPA Registration Number: 64240-45
Date of Submission: December 7, 2011

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated December 7, 2011, for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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 regarding this letter, please contact Clayton Myers at (703) 347-8874, or via email at myers.clayton@epa.gov.


Sincerely,

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

Enclosures: Copy of Label Stamped "Notification"

Please read instructions on reverse before completing form.

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

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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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: right; font-weight: bold; font-size: 1.2em;">NOTIFICATION</div> EPA Reg. No. _____ Product Name _____ <div style="text-align: right; font-weight: bold; font-size: 1.2em;">DEC 21 2011</div>	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

NOTIFICATION

Addition of graphics and minor revisions

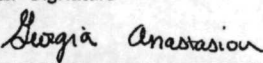
PLEASE READ COVER LETTER FOR DETAILS.

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 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 the 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 <i>*Certification must be submitted</i>	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)
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 December 7, 2011	

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

December 7, 2011

HAND DELIVERED

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

**NOTIFICATION
DEC 21 2011**

**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**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification in accordance with PR Notice 98-10 for the product **Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)**. I am proposing the following changes to the label:

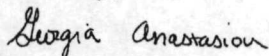
1. Minor language revisions to the label. All changes have been highlighted in the enclosed copy of the label.
2. Addition of graphics that depict where the product can be used.
3. Revisions to the syringe label to make some of the language optional. Currently the label language on the syringe is too difficult for customers to read because the size of the syringe is small which limits the amount of language that can legibly be displayed. In accordance with the EPA Label Review Manual (Section V), we intend to display the required language specified for small containers as well as the precautionary statements. Please note all the label language will be located on the outside carton.

Enclosed please find the following documents in support of this submission:

- A) Application for Pesticide;
- B) One (1) copy of the label with changes highlighted; and,
- C) Two (2) copies of the revised label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com. I thank you in advance for your cooperation.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

4099

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, December 7, 2011
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 1 of 6

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]

NOTIFICATION

DEC 2 1 2011

**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)] [1.05 OZ (30g)] [2.1 OZ (60g)]

EPA Reg. No: 64240-45

EPA Est. No. _____

DISTRIBUTED BY ©2011 COMBAT INSECT CONTROL SYSTEMS, SCOTTSDALE,
ARIZONA 85255. MADE IN [USA] [KOREA].



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

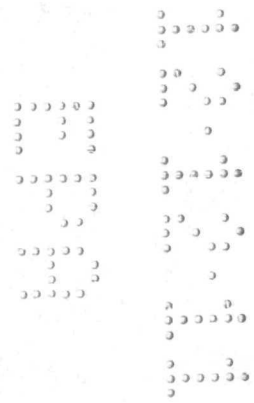
STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

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

DISPOSAL: If empty: 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.

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



6029

Note: **Bold, Italicized text is information for the reader and is not part of the label.**
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[THIS IS] [HOW] [THIS] [COMBAT® [*Alternate Brand Name*] WORKS]
Approved performance claims will appear below this line

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.

[See the entire label inside this package for complete directions]

COMBAT® [*Alternate Brand Name*] 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] [in a line] [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 [as a bead] [in a line] [in a strip] along cracks or crevices. For first application, apply gel in 4 dime-sized spots or several 1½ to 6-inch [beads] [lines] [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.

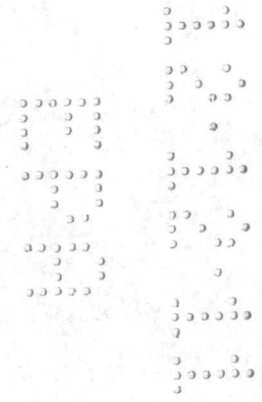
Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]
Underlined or Highlighted text is new.

Optional Label Claims:

1. Easy to use
2. No vapors or fumes
3. For hard-to-reach places such as cracks and crevices
4. Fast control of even large roaches
5. Long residual action
6. Ideal for use with COMBAT® bait stations
7. Guaranteed to work or your money back
8. Starts working in hours
9. COMBAT® [*Alternate Brand Name*] kills roaches fast
10. Roaches eat the gel and die in the nest
11. COMBAT® [*Alternate Brand Name*] 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
12. The gel attracts roaches in search of food and water to the bait
13. Roaches ingest the bait and return to die in their nest
14. Advanced [food] formula*

* versus previous gel formula

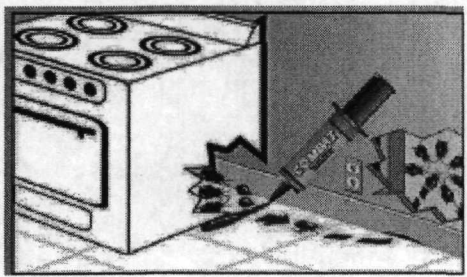
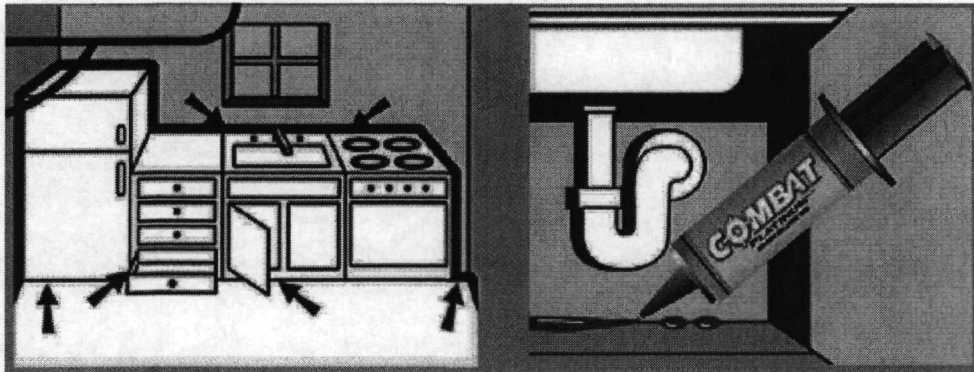
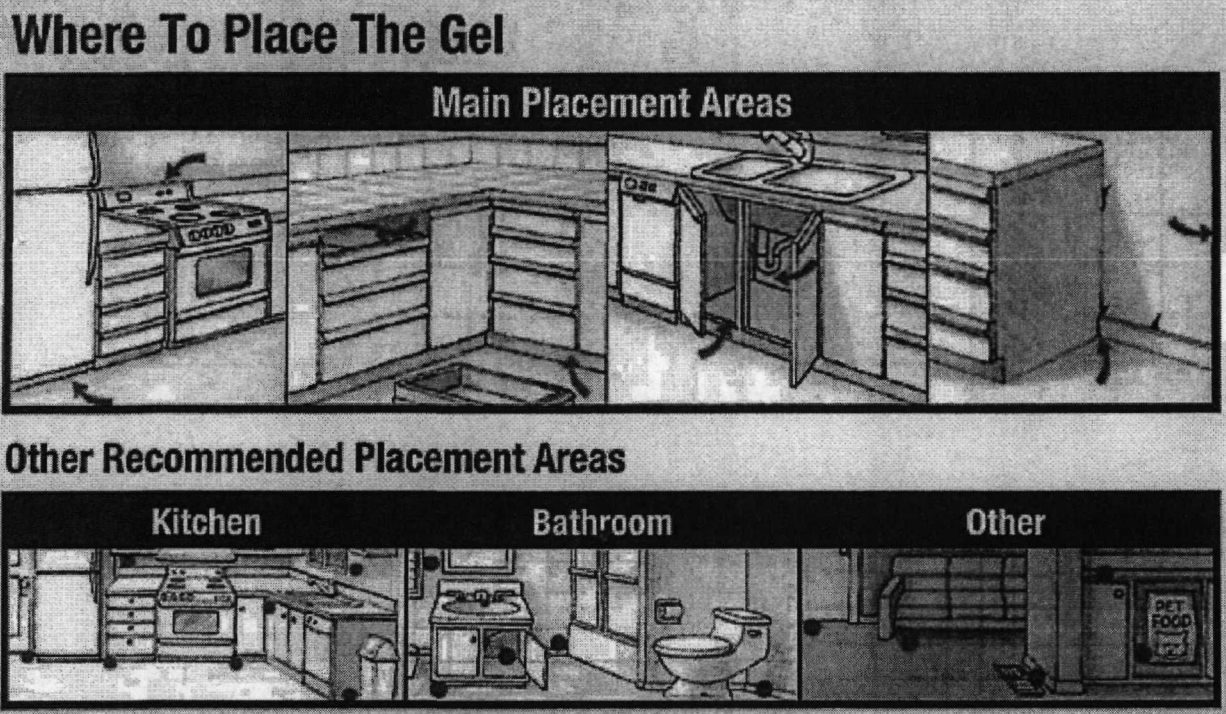
Please recycle empty carton.
Guaranteed to Work or your money back!
Call the Combat® helpline at 1-800-426-6228 for information.



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Optional Graphics:

Note to reviewer: Label may include graphic depictions of recommended placement locations.



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**Syringe Label for:
COMBAT QUICK KILL ROACH KILLING GEL**

Syringe sizes: [0.42 OZ (12 g)] [1.05 OZ (30 g)] [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.

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 ©2011 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)] [1.05 OZ (30 g)] [2.1 OZ (60 g)]

