

64240-95

6/21/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D C 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

June 21, 2012

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

Subject Label Amendment—Addition of nest killing claims and other minor changes
Product Name COMBAT® Quick Kill Roach Killing Gel
EPA Reg No 64240-45
Application Dated January 30, 2012
Decision Number 460383

Dear Ms Anastasiou

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following label revision provisions

- 1 Per the Agency's Product Performance/Efficacy Review (copy enclosed) remove the efficacy claims "This product provides complete roach control" and "Kills roaches for 3 months" from page 5

A copy of the label stamped "accepted with comments" is enclosed for your records. You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers_clayton@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

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

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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 January 12 2012
EPA Reg No 64240-45
Combat Quick Kill Roach Killing Gel
Pg 1 of 7

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%

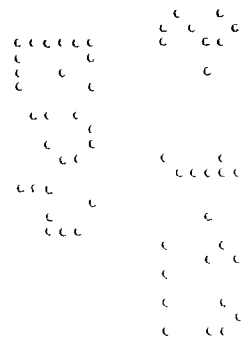
*CAS No 120068-37-3

Contains 1 Syringe
TOTAL NET WT [0.42 OZ (12g)] [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]

**ACCEPTED
With COMMENTS
In EPA Letter Dated
JUN 21 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg No
64240 - 45**



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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

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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 LARGE ROACHES SUCH AS AMERICAN SMOKEY BROWN OR ORIENTAL	2 4 SPOTS (DIME SIZED) OR 3 6 BEAD (LINE/STRIP)

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

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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
- 15 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Get][s] [to] [the nest] [,] [the source of] [the] [your] [roach] problem]
- 16 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches where they [hide] [breed] [live] [nest]
- 17 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you [see][don't see]
- 18 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches [where] [you] can't see [them]
- 19 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you see and [those] [the ones] you don't [see]
- 20 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the roach] [roaches at the] source
- 21 [COMBAT®] [*Alternate Brand Name*] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [roaches in the nest] [the roach nest]
- 22 [COMBAT®] [*Alternate Brand Name*] Lets roaches [Kill] [Stop] [Eliminate] [Destroy] [other] roaches
- 23 Roaches [take] [share] [it] [COMBAT®] ['s ingredients] [the] [insecticide] [gel] [back to] [back at] [with] [in] the nest
- 24 Roaches share the [insecticide] [gel] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying the nest]
- 25 Roaches share the [insecticide] [gel] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying [the] [local] [your] [roach] population]
- 26 Roaches eat the [insecticide] [gel] and die in the nest
- 27 Roaches are attracted to the [insecticide] [gel] and take it back to their nest
- 28 Roaches ingest the [insecticide] [gel] and return to die in their nest
- 29 [Fast acting] formula [that] quickly kills roaches [in the nest]
- 30 Kills quickly and keeps on killing [roaches] [back at the nest]
- 31 Kills roaches [at their source] [in the nest]

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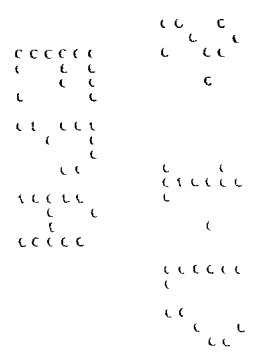
Underlined or Highlighted text is new

- 32 Prevents roach reproduction
- 33 As [The] [Domino Effect™] [insecticide] [bait] [gel] spreads through the roach population, [most] roaches are killed [, and [still] others lose their ability to reproduce]
- 34 This product[’s patented action formula] kills roaches
- 35 This product provides complete roach control
- 36 This product *disrupts the reproductive cycle of roaches*
- 37 Kills roaches while you sleep
- 38 Kills roaches for 3 months
- 39 [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
- 40 [Kills] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don’t] [and] [invade your home]
- 41 [Indoor and] Outdoor (adjacent to the home) [roach] control
- 42 [Ideal for] use with COMBAT® [*another Combat product name*]
- 43 [COMBAT®] [*Alternate Brand Name*] [is] [Ideal] [for] use [in combination] with [other] COMBAT® roach bait [station][s] products [for maximum control]

Please recycle empty carton

Guaranteed to Work or your money back!

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

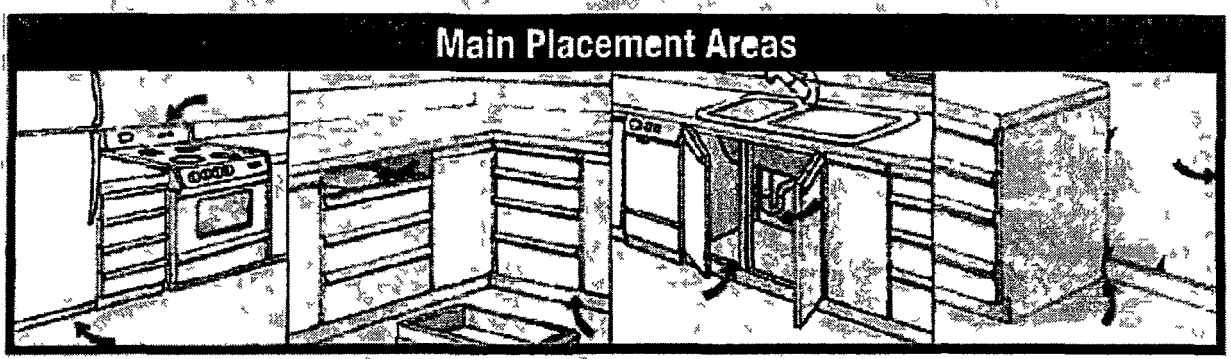


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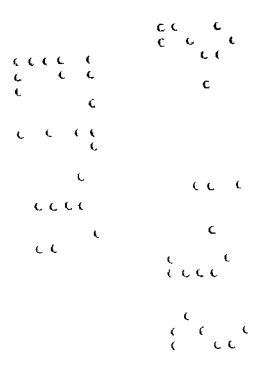
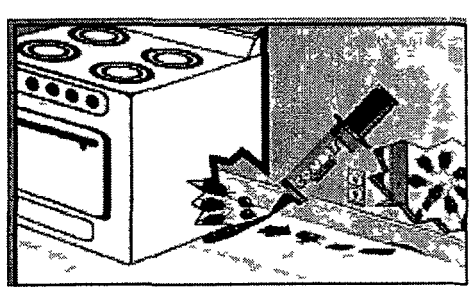
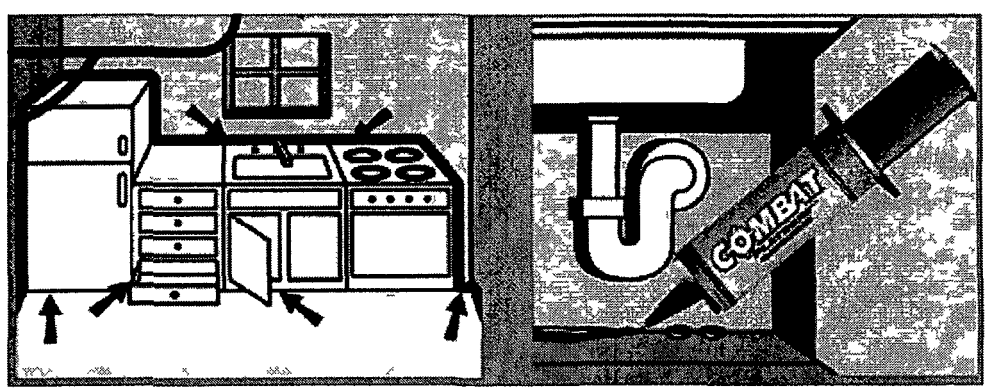
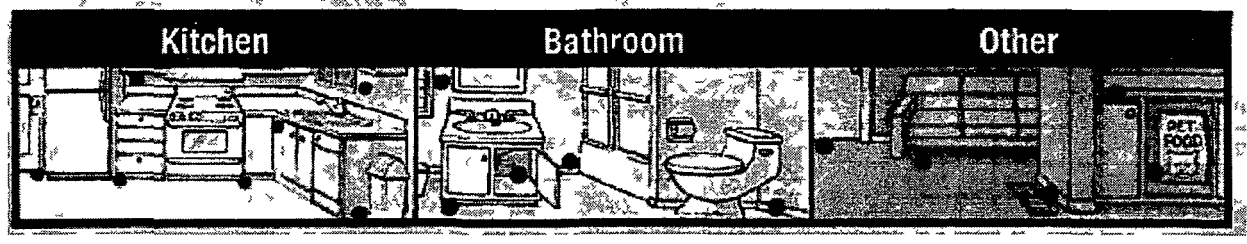
Optional Graphics

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

Where To Place The Gel



Other Recommended Placement Areas



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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)]

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