

64240-45

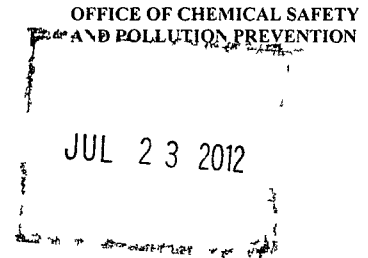
7/23/2012

1 of 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460

Ms Georgia Anastasiou
Agent for Combat Insect Systems
Lewis & Harrison
122 C Street N W Suite 740
Washington DC 20001



Subject Label Notification(s) for Pesticide Registration Notice 98-10

Dear Ms Anastasiou

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 10 2012 for the following product(s)

Combat Max Roach Killing Gel	Alternate Brand Name
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The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 98-10 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

Combat® Quick Kill Roach Killing Gel	EPA Reg No 64240-45
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If you have any questions please contact Linda A DeLuise at 703-305-5428

Sincerely

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

Richard J Gebken
Product Manager
Insecticide Branch
Registration Division (7504P)



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 EPA Reg No _____ Product Name NOTIFICATION <div style="text-align: right;">JUL 23 2012</div>	

Section - II

- Amendment Explain below
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- Me Too Application
- Notification Explain below**
- Other Explain below

Explanation Use additional page(s) if necessary (For Section I and Section II)

Notification of the Alternate Brand Name Combat Max Roach Killing Gel

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	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)
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***Certification must be submitted**

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
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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

2 Signature <i>Georgia Anastasiou</i>	3 Title Agent for Combat Insect Control System	6 Date Application Received (Stamped)
4 Typed Name Georgia Anastasiou Lewis & Harrison LLC	5 Date July 10 2012	

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

July 10, 2012

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

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 Name

Dear Mr Gebken

On behalf of Combat Insect Control Systems, I submitting a notification to propose the following alternate brand name for the product Combat Quick Kill Roach Killing Gel (EPA Reg No 64240-45)

Combat Max 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 copy of the master label with the proposed brand name

If you have any questions, please contact me at 202-393 3903 ext 19 or by email at georgia@lewisharrison.com

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

Handwritten marks consisting of several groups of small, scattered characters or symbols, possibly initials or a signature, located on the right side of the page.

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

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]

Proposed Alternate Brand Name

- [Combat Max Roach Killing Gel]

**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

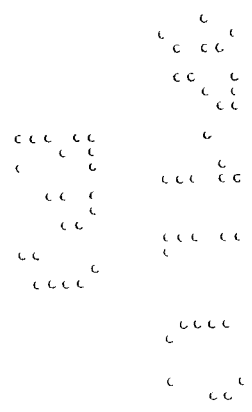
ACTIVE INGREDIENT	Fipronil*	0.01%
OTHER INGREDIENTS		99.99%
*CAS No 120068-37-3		

NOTIFICATION
JUL 23 2012

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]



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

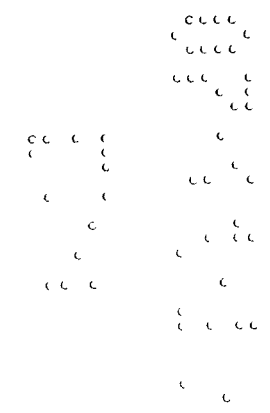
FIRST AID IF ON SKIN OR CLOTHING Take off contaminated clothing Rinse skin immediately with plenty of soap and water for 15 to 20 minutes Call a poison control center or doctor for treatment advice IF IN EYES Hold eye open, rinse slowly and gently with water for 15 to 20 minutes Remove contact lenses, 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 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



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

[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
LARGE ROACHES SUCH AS AMERICAN SMOKEY BROWN OR ORIENTAL	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

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

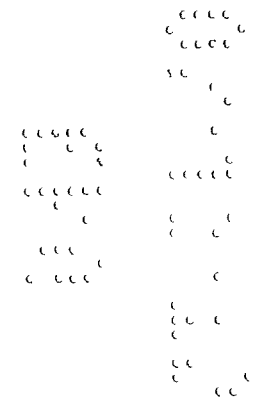
* versus previous gel formula

- 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][c] [killing other roaches] [and] [destroying the nest]
- 25 Roaches share the [insecticide] [gel] [where they breed] [where they nest] [in the nest][s] [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 nes.
- 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]

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

- 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 disrupts the reproductive cycle of roaches
- 36 Kills roaches while you sleep
- 37 [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
- 38 [Kills] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don’t] [and] [invade your home]
- 39 [Indoor and] Outdoor (adjacent to the home) [roach] control
- 40 [Ideal for] use with COMBAT® [***another Combat product name***]
- 41 [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



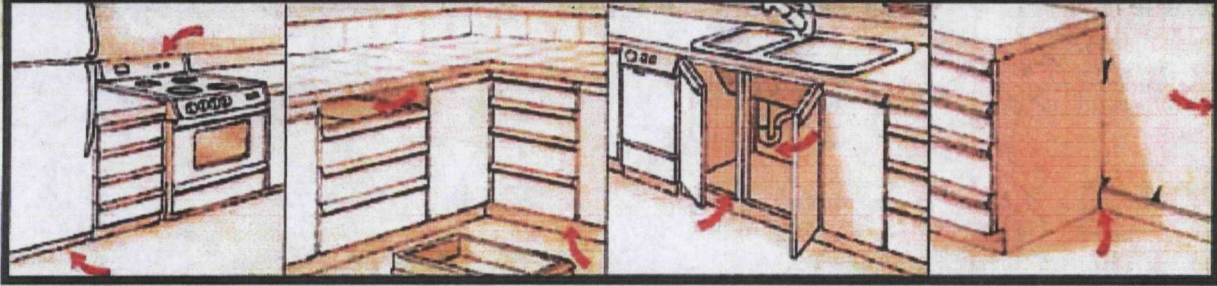
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Optional Graphics:

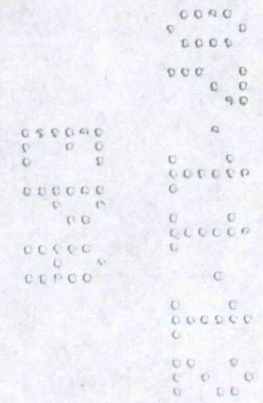
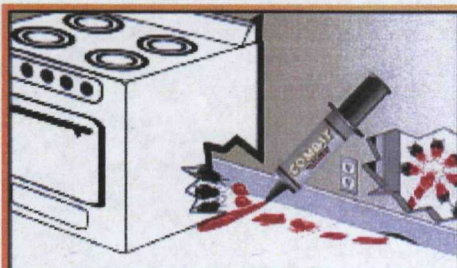
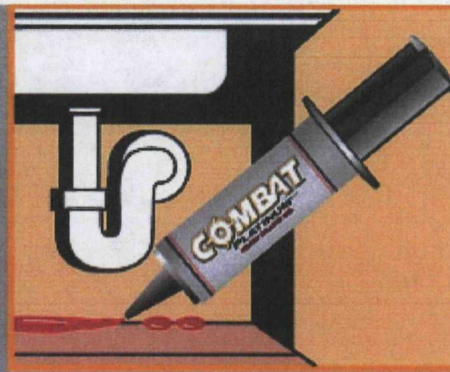
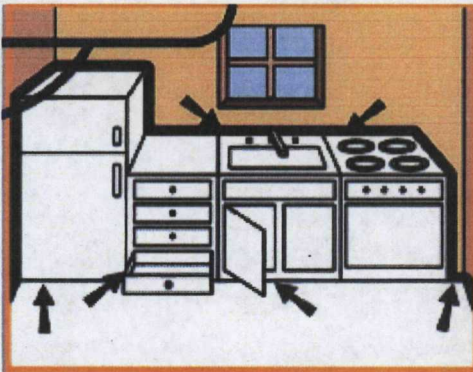
Note to reviewer: Label may include graphic depictions of recommended placement locations.

Where To Place The Gel

Main Placement Areas



Other Recommended Placement Areas



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)]

