

64240-45

2/25/2014

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 25, 2014

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 February 4, 2014 for the following product(s):

Combat Max Defense System Brand	Alternate Brand Name
Roach Killing Gel	

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)

 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 Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001 <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. _____ FEB 25 2014 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.)

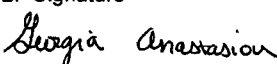
Notification to add Additional Brand Name

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:				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	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 February 4, 2014	

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LEWIS & HARRISON

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs
February 4, 2014

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 to Add Alternate Brand Name**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45). The purpose of this notification is add the alternate brand name: "Combat Max Defense System Brand Roach Killing Gel".

In support of this submission enclosed please find the following documents:

- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted; and,
- 3) Two (2) copies of the revised label.

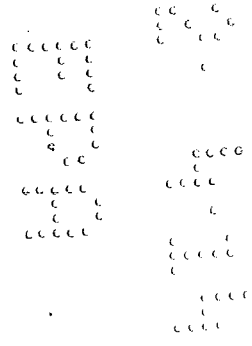
If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for Combat Insect Control Systems

cc: Arlana Burgato (Combat Insect Control Systems)



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

Master Label, February 4, 2014
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 1 of 7

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COMBAT® QUICK KILL ROACH KILLING GEL

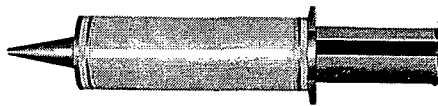
Approximate position of approved marketing claims & bursts

Approved Alternate Brand Names:

- [Combat Platinum Brand Roach Killing Gel]
- [Combat Source Kill Max R3]
- [Combat Defense System Brand Source Kill Max3]
- [Combat Max Roach Killing Gel]
- [Combat Defense System Brand Max Roach Killing Gel]
- [Combat Max Defense System Brand Roach Killing Gel]

NOTIFICATION

FEB 25 2014



**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. _____

[Manufactured for] [Distributed by] [&] ©201[4][5] Combat Insect Control Systems
[N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

Note: **Bold, Italicized text is information for the reader and is not part of the label.**
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Master Label, February 4, 2014
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 2 of 7

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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, using tobacco or using the toilet.

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 batch code will be printed on each syringe.}

For front or back or side panel:

[Satisfaction guaranteed] [Guaranteed to work] [or your money back][!]

[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[For information], [call the] Combat® [Labs] [Information] Helpline [:] [at] 1-800-426-6228.]

[[For questions or comments, please] call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information].

[For questions or comments about COMBAT, call 1-800-426-6228].

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

[[] [[The] [Paperboard in] [this] Carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

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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.

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

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[Bracketed information is optional text.]
Highlighted text is new.

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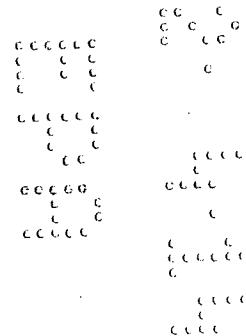
- 32. Kills roaches [at their source] [in the nest]
- 33. [Destroy(s)] [kill(s)] the nest
- 34. Prevents roach reproduction
- 35. As [The] [Domino Effect™] [insecticide] [bait] [gel] spreads through the roach population, [most] roaches are killed [, and [still] others lose their ability to reproduce]
- 36. This product[’s patented action formula] kills roaches
- 37. This product disrupts the reproductive cycle of roaches
- 38. Kills roaches while you sleep
- 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]
- 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]
- 44. ROACH
- 45. [Works] for [even] severe infestations

Optional Henkel Quality statement for front or back or side panel:



Optional Graphics:

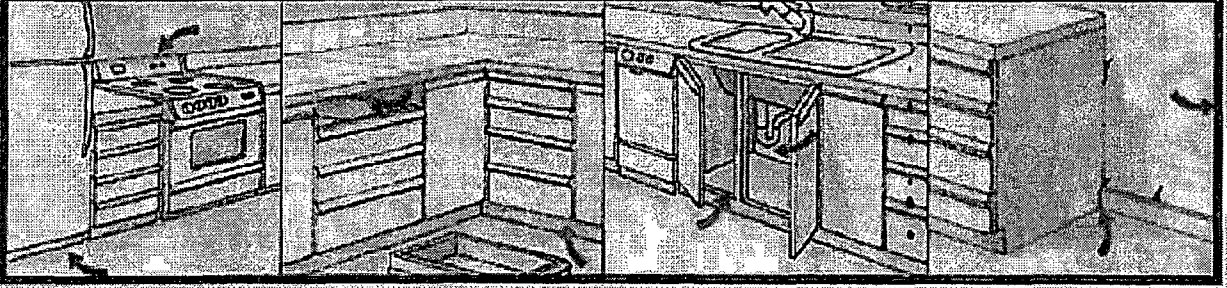
Note to reviewer: Label may include graphic depictions of recommended placement locations.



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Where To Place The Gel

Main Placement Areas



Other Recommended Placement Areas

