



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 15, 2016

Georgia Anastasiou
Combat Insect Control Systems
c/o Lewis & Harrison, LLC
112 C Street, Suite 505
Washington, DC 20001

Subject: Label Amendment – Add Optional Marketing Claims and Use Recommendations
Product Name: COMBAT QUICK KILL ROACH KILLING GEL
EPA Registration Number: 64240-45
Application Date: October 15, 2015
Decision Number: 510550

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'KBD', enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

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, March 10, 2016
EPA Reg. No. 64240-45
Combat Quick Kill Roach Killing Gel
Pg 1 of 8

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]



**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%

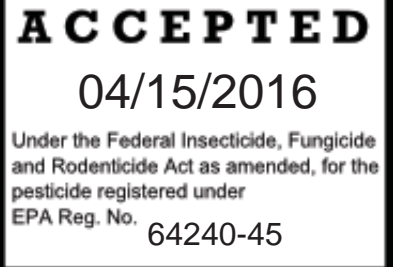
*CAS No. 120068-37-3

Contains: 1 Syringe

[TOTAL] NET WT _____

EPA Reg. No: 64240-45

EPA Est. No. _____



[Manufactured for] [Distributed by] [&] © [Year] Combat Insect Control Systems
[7201 E. Henkel Way], Scottsdale, [AZ] [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.]
Highlighted text is new.

Product may stain textiles and clothing.

Keep gel away from foods and food contact surfaces.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: 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. You may also contact 1-800-426-6228 for emergency medical treatment information.

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

CONTAINER HANDLING: 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]

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.

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.]

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.

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]

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.

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
46. Starts working as soon as roaches feed on bait
47. Starts killing overnight
48. Kills roaches 24/7 for up to 3 months
49. Kills quickly [and keeps on killing] [[for] up to 3 months]
50. [Kills] [Starts Killing] in hours – up to 3 months
51. Kills [non-stop] [for] up to 3 months
52. Kills fast – up to 3 months
53. Kills in hours, [Non-stop] [for] up to 3 months
54. [Fast Acting] [and] [effective] killing [[for] up to 3 months]
55. Kills [with][in] 24 hours [and [for] [Lasts] up to 3 months]
56. Kill the ones you see and the ones you don’t [see]
57. Kill[s] [the] [entire] nest
58. [Your] Secret weapon [against roaches]



Promo Claims

- [[x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X%][Extra] [Free] [Bonus] ^{††} [With Purchase] ^{††} [for free]
- Value [Pack] [Size]
- Bonus Pack

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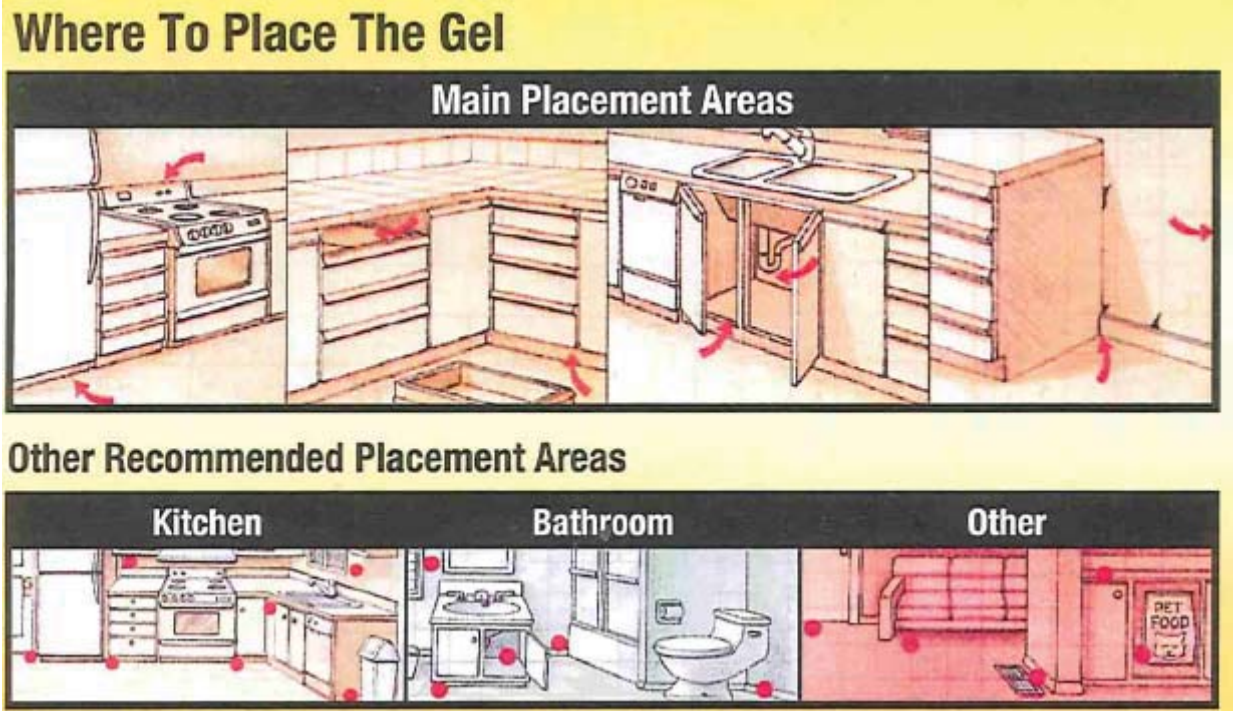
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- Double Pack
††vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

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



Optional Graphics:

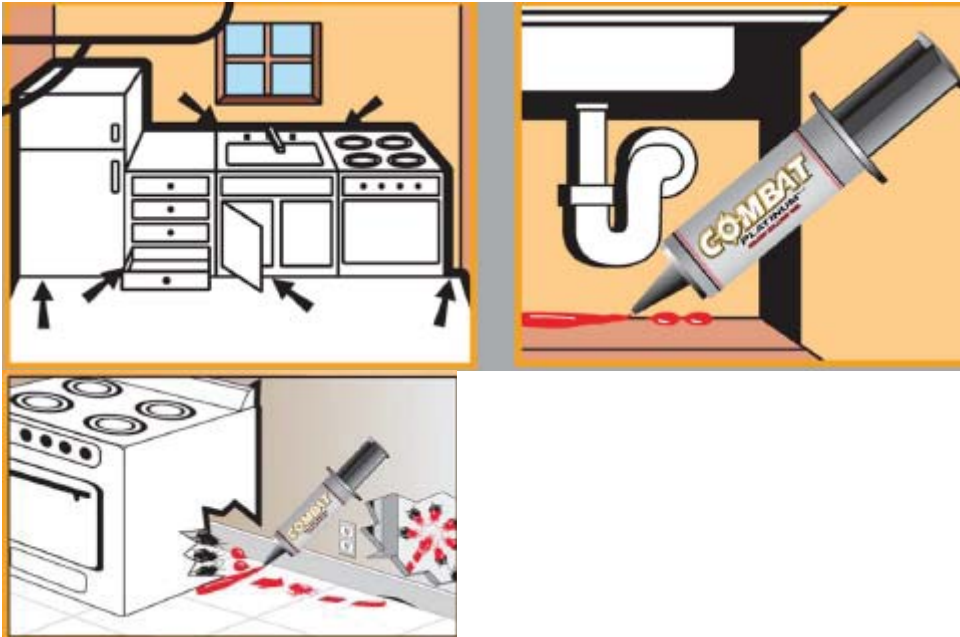
Note to reviewer: Label may include graphic depictions of recommended placement locations.



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[Bracketed information is optional text.]

Highlighted text is new.



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.

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

[Syringe sizes] [Net wt.]: [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.)

[ROACH]

NOTE: DO NOT REMOVE THIS LABEL.

SEE [CARTON] [INSERT] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

LEER LAS INSTRUCCIONES Y PRECAUCIONES EN EL CARTON.

Use only in areas inaccessible to children and pets.

KEEP OUT OF REACH OF CHILDREN AND PETS

Keep gel away from foods and food contact surfaces.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: 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. You may also contact 1-800-426-6228 for emergency medical treatment information.]

[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: PESTICIDE STORAGE: Store in a cool, dry area out of reach of children. **CONTAINER HANDLING:** 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.

COMBAT® QUICK KILL ROACH KILLING GEL

[Alternate Brand Name]

Product may stain textiles and clothing.

Questions or Comments call 1-800-426-6228.

[Manufactured for] [Distributed by] [&] © [Year] Combat Insect Control Systems
[7201 E. Henkel Way] Scottsdale, [AZ] [ARIZONA] 85255

MADE IN [USA][KOREA]

EPA Reg. No. 64240-45, EPA Est. No. _____

ACTIVE INGREDIENT: Fipronil*0.01%
OTHER INGREDIENTS:.....99.99%
TOTAL:.....100.00%

*CAS NO. 120068-37-3

NET WT [0.42 OZ (12 g)] [1.05 OZ (30 g)] [2.1 OZ (60 g)] _____