

64240-46

06/23/2008

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**U.S. ENVIRONMENTAL PROTECTION  
AGENCY**  
**Office of Pesticide Programs**  
**Registration Division (7505P)**  
**Ariel Rios Building**  
**1200 Pennsylvania Ave., NW**  
**Washington, D.C. 20460**

EPA Reg.  
Number:  
**64240-46**

Date of Issuance:  
**JUN 23 2008**

NOTICE OF PESTICIDE:  
 Registration  
 Reregistration  
 (under FIFRA, as amended)

Term of Issuance: **Unconditional**

Name of Pesticide Product:  
**Combat Streamlined Roach Bait**

Name and Address of Registrant (include ZIP Code):  
**Combat Insect Control Systems c/o Henkel Consumer Goods Inc.**  
**Ana Rodriguez-Koster, Agent**  
**Lewis and Harrison**  
**122 C Street NW, Suite 740**  
**Washington, DC 20001**

**Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.**

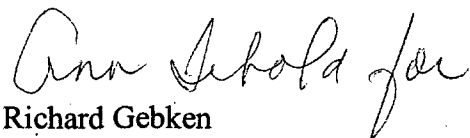
On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered provided you make the label changes listed below. Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

Make the following label changes:  
 Change the EPA Reg. No. to 64240-46.

Weights must be expressed in US customary units of measure. Metric measures are optional.

Delete "for best results", "for thorough control", "baits work best" from the directions for use as they make compliance with the directions for use optional.

Signature of Approving Official:  
  
**Richard Gebken**  
**Product Manager 10**  
**Insecticide Branch**  
**Registration Division (7505P)**

Date:  
**JUN 23 2008**

To prevent misuse, statements about where to place bait stations must be qualified as follows:  
“wherever you see or have seen roaches in the following places:[list specific placement areas]”,  
“wherever roaches have been found in the following places: [list specific placement areas]”.

The cited product provided a calendar to replace bait stations every 3/6 months. Similarly, revise the label to provide a calendar in the directions for use to replace bait stations every 3/6 months.

The following comparative claims are acceptable only if revised to compare specifically to Combat products:

25% more free

50% more free

25% 50% more baits

More Baits – Better value

Value pack – More baits.

This means faster and more effective control of your roach problem

Claims that the product is new or the design is new are limited to six months after registration or first release of the product from the warehouse, whichever is later.

Comments regarding the confidential statement of formula are addressed in a separate letter.

Submit two copies of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

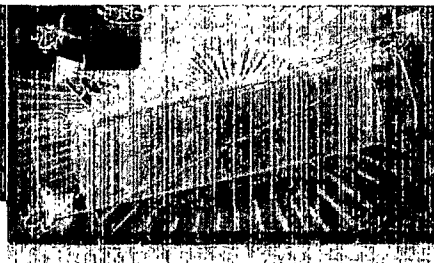
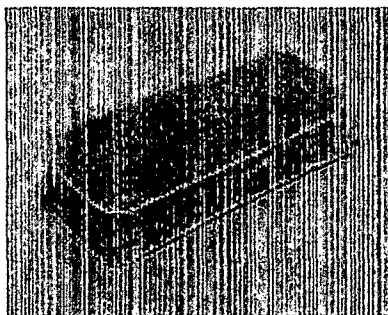
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Note: **Bold, Italicized text is information for the reader and is not part of the label.**  
[Bracketed information is optional text.]

Master Label, March 2008  
EPA Reg. No. 64240-\_\_\_\_  
Combat Streamlined Roach Bait  
Pg 1 of 7

# COMBAT® Streamlined Roach Bait

[Alternate Brand Name (to be determined)]



-or-

[Kills][For] Small Roaches

-or-

[Kills][For] Large Roaches[, Waterbugs & Palmetto Bugs]

-or-

[Kills][For] Small Roaches and Large Roaches[, Waterbugs & Palmetto Bugs]

[ROACH]

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

JUN 23 2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
64240-46

ACTIVE INGREDIENT: Hydramethylnon† .....2.0%  
OTHER INGREDIENTS: .....98.0%  
†CAS No. 67485-29-4

KEEP OUT OF REACH OF CHILDREN AND PETS

## CAUTION

[See [end] [side] [bottom] [top] [back] panel for additional precautionary statements.]

-or-

[See precautionary statements on side [back] panel.]

EPA Reg. No. 64240-\_\_\_\_

EPA Est. No. \_\_\_\_\_

Distributed by & ©2008 Combat Insect Control Systems  
[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] [85254]  
[MADE IN U.S.A.]

[Contains] [2] [4] [6] [8] [12] [16] [18] Bait[s] [Stations] [For Small Roaches] -or- [For Large Roaches] -or- [For Large and Small Roaches] [each containing 1.0 g [1.75 g]]

[TOTAL] NET WT.[:] [0.07 oz (2g)] [0.12 oz (3.5g)] [0.14 oz (4g)] [0.21 oz (6g)]  
[0.25 oz (7g)] [0.28 oz (8g)] [0.37 oz. (10.5g)] [0.42 oz. (12g)] [0.5 oz. (14g)]  
[0.56 oz. (16g)] [0.6 oz. (18g)] [0.7 oz. (21g)] [0.99 oz. 28g)] [1.0 oz. (31.5g)]

[U.S. Patent Nos. \_\_\_\_\_ and other patents pending.]

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## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Pets may be attracted to the smell of the bait. Place bait in areas inaccessible to pets.

**FIRST AID:** If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. 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. Combat [Information] Helpline: 1-800-426-6228.

### STORAGE AND DISPOSAL

**STORAGE:** Store in 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 water agency or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

### ***For front or back or side panel:***

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



[[The paperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_% Recycled fiber [minimum \_\_\_\_\_% post consumer content]] [Please Recycle Empty Carton.]

***{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.}***

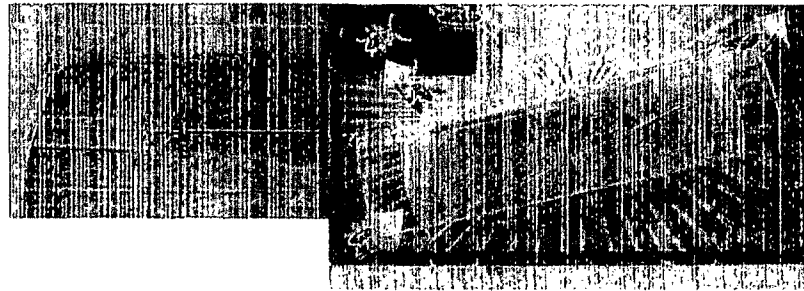
## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

### GENERAL INFORMATION

[THIS IS] [HOW] [THIS] COMBAT® [Streamlined Roach Bait] [*Alternate Brand Name (to be determined)*] [PRODUCT] WORKS:

- [1.] Roaches enter [the] bait station and eat the bait.
- [2.] [Roaches take the bait back to the nest.] *-or-* [Roaches return to their nest and die.]
- [3.] [Roaches share the bait, killing other roaches and destroying the nest.] *-or-* [Other roaches eat them and die, creating a chain reaction.]



*-and/or-*



[This product is specifically designed for roaches. [small roaches.] [large roaches] [large roaches, waterbugs & palmetto bugs.] [small and large roaches.]

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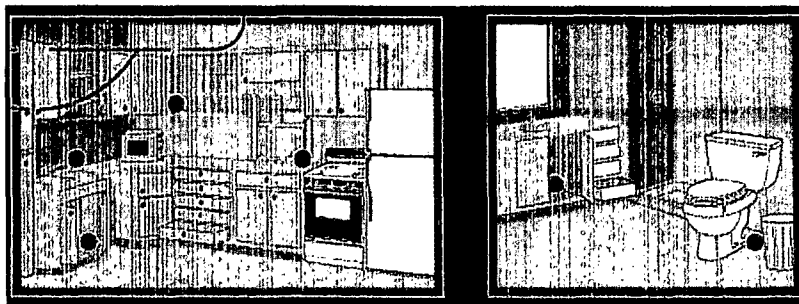
## DIRECTIONS FOR USE, continued

### GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove label on bait stations.

### APPLICATION INSTRUCTIONS

1. [For best results] Use all [2] [4] [6] [8] [12] [16] [18] bait[s] [stations] [at the same time] [for thorough control.] [Remove wrapper.] [Do not remove [the] label[s] on bait station[s].] Place bait[s] [stations] wherever you see [or have seen] roaches **-or-** signs of roaches [at least 2 bait stations in the kitchen and 2 in each bathroom] as shown in diagrams [to the right] [left] [above] [below]  
[Refer to diagram[s] for [other] placement locations.]  
[Severe roach problems may require 2 boxes or more.]  
[Place bait stations wherever roaches are seen **-or-** near doors and windows.]  
[Place bait stations wherever roaches are seen and near doors and windows.]  
[Specific placement areas include [under [underneath] appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.] [under [underneath] refrigerator and appliances, inside cabinets and drawers.]
2. Place [baits] properly so [that] they are touching walls [and] [or] corners.  
[Do not use sprays or foggers [around] [on or near] baits[:] [as] they can contaminate bait stations and reduce effectiveness.]  
[Food storage and water sources are the most common roach areas.]  
[Then place additional baits about 1 ½ feet away.]  
[The more bait stations placed out, the more roaches find the bait.]  
[This means faster and more effective control of your roach problem.]  
[Bait[s] [stations] work best [when] touching corners [and] [or] walls.]
3. Replace all [2] [4] [6] [8] [12] [16] [18] bait[s] [stations] [at least] every 3 months, or sooner if infestation is heavy **-or-** [roaches] [they] return [because roaches have probably eaten all of the bait inside]. [Baits will need to be replaced since [because] [the] roaches have probably eaten all the bait inside.]



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***Claims for Front or Back:***

**Value claims:**

***Value claims are only for packs with net contents greater than 2 baits, not to exceed 18:***

- Bonus Pack
- 25% More [Free]
- 50% More [Free]
- [25%] [50%] More Baits
- [4] [6] [8] [12] Bonus Baits With Purchase
- More Baits — Better Value
- Value Pack — More Baits

**Appearance claims:**

- New [design][look]
- [A][roach][bait][station]you will hardly notice
- Discreet [design][roach baits]
- For discreet roach control
- Designed to kill roaches discreetly
- [Simple] [streamlined] [rectangular] [design] Fits discreetly [behind][appliances][furniture] and [underneath] [under] [cabinets] [cupboards] [vanities]
- Ideal for use against [large][and][small]roaches
- Laboratory and home use tests prove COMBAT® [Alternate Brand Name (*to be determined*)] provides 3 months of effective control (for small roaches).
- Easy to use
- Nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor

**Performance claims:**

***For Small Roaches:***

- This product is specifically designed for small roaches.
- Kills eggs and roaches [or roaches and eggs] at their source
- Prevents roach reproduction
- Prevents egg hatching
- The Domino Effect™
- As The Domino Effect™ spreads through the roach population, most roaches are killed, and still others lose their ability to produce eggs
- This product's patented action formula kills roaches and eggs
- This product provides complete roach control
- This product disrupts the reproductive cycle of roaches
- Kills roaches and eggs while you sleep
- Kills roaches & eggs for 3 months
- Kills roaches at their source
- Three months effective control

***For Large Roaches:\****

- Kills roaches at their source
- Large bait kills large roaches
- Solves large roach problems

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[Bracketed information is optional text.]

Master Label, March 2008  
EPA Reg. No. 64240-\_\_\_\_  
Combat Streamlined Roach Bait  
Pg 6 of 7

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[Should you have any questions regarding COMBAT<sup>®</sup>, please call 1-800-426-6228, *-or-*  
[For questions or comments, please c][C]all the COMBAT<sup>®</sup> Information Helpline at 1-800-426-  
6228 for more information.]] Questions or Comments? Call 1-800-426-6228



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**UNIT LABEL**

**COMBAT<sup>®</sup> Streamlined Roach Bait**  
***[Alternate Brand Name (to be determined)]***

**[THIS SIDE DOWN [OR] AGAINST [THE] SURFACE.]**

**[THIS SIDE DOWN: This side should be placed against the surface.]**

**Note: Do not remove this label.**

ACTIVE INGREDIENT: Hydramethylnon† .....2.0%

OTHER INGREDIENTS: .....98.0%

†CAS No. 67485-29-4

**KEEP OUT OF REACH OF CHILDREN AND PETS**

**CAUTION**

**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 or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Should you have any questions regarding COMBAT<sup>®</sup>, please call 1-800-426-6228] [For questions or comments, please c] [C]all the COMBAT<sup>®</sup> Information Helpline at 1-800-426-6228 for more information.]] [Questions or Comments? Call 1-800-426-6228]

Distributed by & ©2008 Combat Insect Control Systems  
[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254  
MADE IN USA

EPA Reg. No. 64240-\_\_\_\_  
EPA Est. No. \_\_\_\_\_

[FOR SMALL ROACHES]  
[FOR LARGE ROACHES]  
[FOR SMALL AND LARGE ROACHES]

**SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS *-or-***  
**ADDITIONAL PRECAUTIONARY STATEMENTS**

NET WT. [0.035 oz (1g)] [0.062 oz (1.75g)]