

64240-46

8/29/2008

4/13



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

AUG 29 2008

Ms. Ana Rodriguez-Koster  
Lewis & Harrison, LLC  
For Combat Control Systems  
122 C. Street NW # 740  
Washinton, D.C. 20001

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request Alternate Brand Name "Combat Hideaway Roach Baits"  
and General Label Changes  
EPA Reg. 64240-46  
Application Dated July 23, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/23/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



Underlined text is new

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

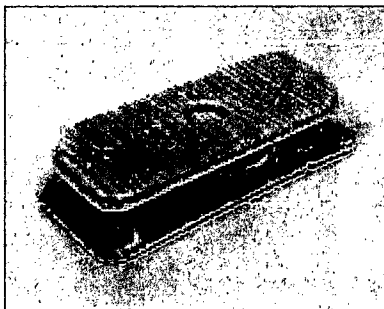
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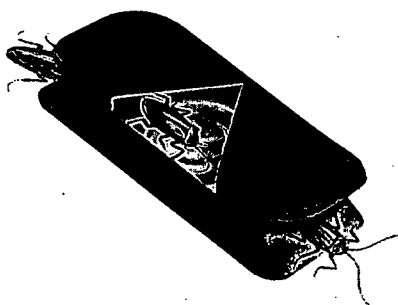
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# COMBAT® Streamlined Roach Bait

Alternate Brand Name:  
**Combat Hideaway Roach Baits**



-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]

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. 64240-46

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

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

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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]

~~Strikethroughs~~-indicate deleted text

Master Label, JULY, 2008  
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Combat Streamlined Roach Bait  
Pg 2 of 7

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[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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Master Label, JULY, 2008  
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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 baits in areas inaccessible to pets.

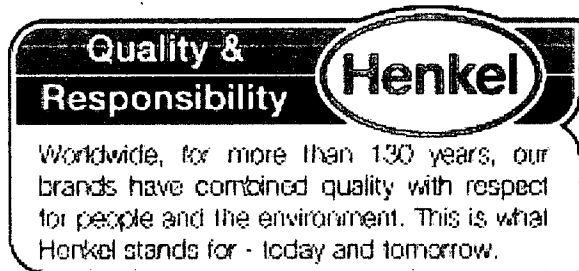
**FIRST AID:** If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. 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:**



-or-



[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,] [C]call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information]. -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.}**

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Master Label, JULY, 2008  
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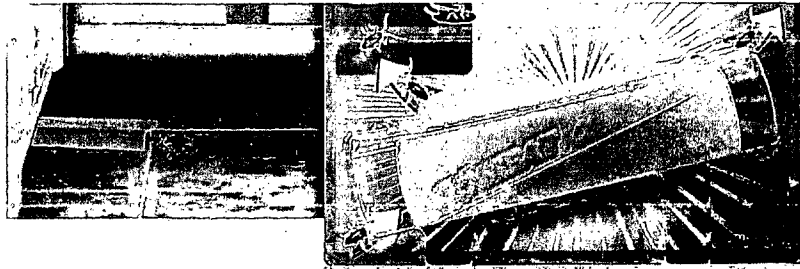
## DIRECTIONS FOR USE

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

### [GENERAL INFORMATION]

[THIS IS] [HOW] [THIS] COMBAT® [Streamlined Roach Bait] [Combat Hideaway Roach Baits] [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.]

**DIRECTIONS FOR USE, *continued***

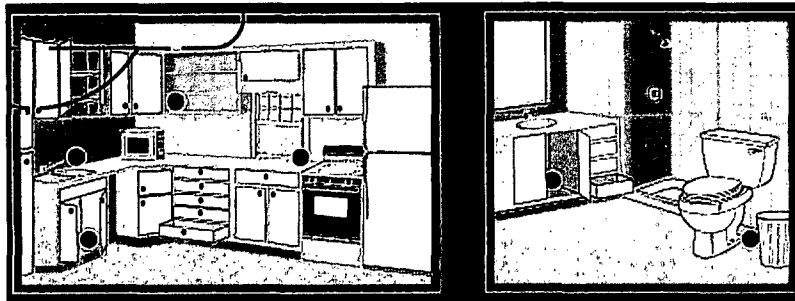
***{Note to Reviewer: This statement will appear on the outside container label when Step #1 of the Directions for Use (below) omits the language "Do not remove the label on bait stations":}***

**[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 in the following places: [under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.] ~~-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 in the following places: [under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.] ~~-or-~~ near doors and windows.] [Place bait stations wherever roaches are seen in the following places: [under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers.] 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.]



**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]\*\*\* \*\*\* vs. standard size of this [Combat] product
- 50% More [Free]\*\*\* \*\*\* vs. standard size of this [Combat] product
- [25%] [50%] More Baits\*\*\* \*\*\* vs. standard size of this [Combat] product
- [4] [6] [8] [12] Bonus Baits With Purchase
- More Baits — Better Value\*\*\* \*\*\* vs. standard size of this [Combat] product
- Value Pack — More Baits\*\*\* \*\*\* vs. standard size of this [Combat] product

**Appearance claims:**

- New [design][look][!] **[NOTE: "New" limited to six months after first release from warehouse]**
- [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] 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

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



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Master Label, JULY, 2008  
EPA Reg. No. 64240-46  
Combat Streamlined Roach Bait  
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UNIT LABEL

**COMBAT<sup>®</sup> Streamlined Roach Bait**

Alternate Brand Name:

**Combat Hideaway Roach Baits**

[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**

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

EPA Reg. No. 64240-46

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

*{Note to Reviewer: Due to size limitations, the language below may or may not appear on the bait station (unit) label:}*

**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]

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[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254  
MADE IN USA

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

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

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

# COMBAT®

HIDEAWAY™ ROACH BAIT



# COMBAT®

## HIDEAWAY™ ROACH BAIT

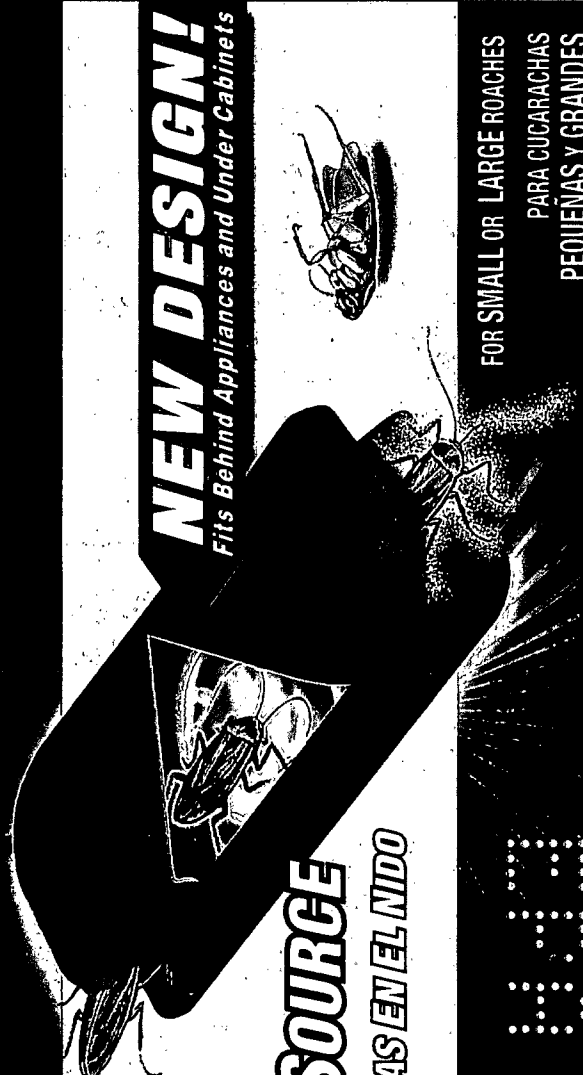


HIDEAWAY™ ROACH BAIT

# COMBAT®

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**KILLS  
ROACHES  
AT THEIR SOURCE**  
MATA CUCARACHAS EN EL NIDO



**NEW DESIGN!**  
Fits Behind Appliances and Under Cabinets

KEEP OUT OF REACH OF  
CHILDREN AND PETS.

CAUTION: SEE PRECAUTIONARY  
STATEMENTS ON BACK PANEL.

MANTENGA ALEJADO DEL ALCANCE DE:  
NIÑOS Y MASCOTAS.

PRECAUCIÓN: LEER LAS PRECAUCIONES  
DENTRÓ DE LA CAJA.

FOR SMALL OR LARGE ROACHES  
PARA CUCARACHAS  
PEQUEÑAS Y GRANDES

**8** BAIT STATIONS  
TRAMPAS

TOTAL NET WT 0.28 OZ (8g)

ACTIVE INGREDIENT: Hydramethylnon ..... 2.0%

OTHER INGREDIENTS ..... 55.0%

CAS No. 57635-29-4

INGREDIENTE ACTIVO: Hidrametnón ..... 2.0%

OTROS INGREDIENTES ..... 55.0%

CAS No. 67455-29-4



- A roach bait station you will hardly notice
- Simple rectangular design fits discreetly behind appliances, furniture, underneath cabinets and cupboards
- Ideal for use against large and small roaches
- Easy to use

- Una estación de cebado que apenas se nota
- El diseño simple rectangular cabe de manera discreta atrás de electrodomésticos, muebles, abajo de gabinetes y armarios
- Es ideal para combatir cucarachas grandes y pequeñas
- Fácil de usar

**DIRECTIONS FOR USE/MODO DE EMPLEO:**

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

SE CONSIDERA UNA VIOLACIÓN A LA LEY FEDERAL USAR ESTE PRODUCTO CON OTROS FINES QUE LOS INDICADOS EN LA ETIQUETA.

**HOW COMBAT WORKS:**

**COMO FUNCIONA:**



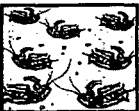
Roaches enter bait station and eat the bait.

Las cucarachas entran a la trampa para alimentarse.



Roaches take the bait back to the nest.

Las cucarachas transportan el cebo a su nido.



Roaches share the bait, killing other roaches and destroying the nest.

Las cucarachas comparten el cebo, matando a otras cucarachas y destruyendo el nido.

**GUARANTEED TO WORK**

OR YOUR MONEY BACK! Call the COMBAT®

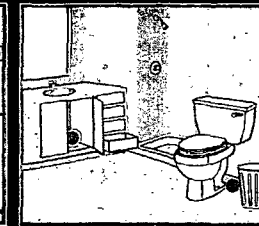
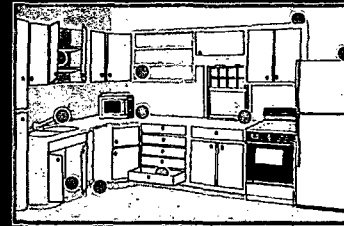
HELPLINE at 1-800-426-6228 for information.

**EFEECTO GARANTIZADO**

O LE DEVOLVEREMOS SU DINERO! Para

información llamar a la línea de

Ayuda Combat® 1-800-426-6228



**APPLICATION INTRUCTIONS/INSTRUCCIONES PARA LA APLICACIÓN:**

**1 Use all 8 bait stations.** Do not remove labels on bait stations. Place baits wherever you see or have seen roaches in the following places: under appliances and sinks, on floor along baseboards, near pet food storage and inside cabinets and drawers. Refer to diagrams for placement locations.

**Use todas las 8 estaciones de cebado.** No quite los rótulos de las estaciones de cebado. Coloque el cebo donde vea o haya visto cucarachas en los siguientes lugares: abajo de electrodomésticos y fregaderos, en el piso y a lo largo de zócalos, cerca del almacenamiento de la comida de las mascotas y adentro de gabinetes y cajones. Consulte en el diagrama los sitios donde colocarlos.

**2 Place baits properly** so they are touching walls and corners. Do not use sprays or foggers on or near baits.

**Colocar las trampas** de manera tal que se encuentren en contacto con paredes y esquinas. No usar aerosoles o fumigadores en el área donde se han colocado las trampas.

**3 Replace all 8 baits every 3 months,** or sooner if roaches return because roaches have probably eaten all of the bait inside.

**Cambie las 8 estaciones de cebado cada 3 meses,** o antes si las cucarachas vuelven debido a que posiblemente se hayan comido el cebo que contenían los sitios donde colocarlos.



PLEASE RECYCLE EMPTY CARTON  
POR FAVOR RECICLE EL CARTÓN VACÍO



**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 baits 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 Helpline:** 1-800-426-6228. **STORAGE AND DISPOSAL:** STORAGE: Store in cool, dry area out of reach of children. **DISPOSAL:** If empty: Reread applicable 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-CL547UP for disposal instructions. Never place unused product down any indoor or outdoor drain.

**DECLARACIONES PREVENTIVAS:** PELIGROS PARA SERES HUMANOS Y ANIMALES DOMÉSTICOS. **PRECAUCIÓN:** Es nocivo si se absorbe a través de la piel. Evite el contacto con los ojos, la piel o la ropa. Lávese las manos antes de comer, beber, mascar goma, usar tabaco o usar el baño. Es posible que el olor del cebo atraiga a las mascotas. Coloque el cebo en un sitio inaccesible para las mascotas. **PRIMEROS AUXILIOS:** Si entra en contacto con la piel o la ropa: Quítesela inmediatamente la ropa contaminada. Enjuéguese inmediatamente la piel con agua abundante durante 15 a 20 minutos. Llame inmediatamente a un centro de toxicología o a un médico para conseguir consejos para el tratamiento. Tenga con usted el rótulo del recipiente al llamar a un centro de toxicología o a un médico o al ir para recibir tratamiento. **Línea de Ayuda de Combat:** 1-800-426-6228. **ALMACENAMIENTO Y ELIMINACIÓN:** ALMACENAMIENTO: Almacene en una área fresca y seca lejos de los niños. **ELIMINACIÓN:** Si está vacío: Envase que no se puede volver a llenar. No vuelva a usar ni vuelva a llenar este envase. Ofézcalo para reciclar, si el servicio está disponible. Si no hay reciclado disponible, colóquelo en la basura. Si está parcialmente lleno Llame a su entidad encargada de los residuos sólidos o llame al 1-800-CL547UP para conseguir instrucciones para su eliminación. Nunca vierta el producto sin usar un drenaje ni en alcantarillas.

COMBAT® Hideaway Roach Baits 6 ct.  
Proof of Purchase



**COMBAT. Hideaway™ Roach Baits**

**DO NOT REMOVE THIS LABEL/NO QUITAR ESTA ETIQUETA**

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

OTHER INGREDIENTS: .....98.0%

†CAS No. 67485-29-4

**KEEP OUT OF REACH OF CHILDREN AND PETS  
MANTENGA ALEJADO DEL ALCANCE DE NIÑOS Y MASCOTAS.**

**CAUTION/PRECAUCIÓN**

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS  
VEA LAS INSTRUCCIONES Y LAS PRECAUCIONES COMPLETAS EN LA PARTE EXTERIOR DEL ENVASE

EPA Reg. No. 64240-46 EPA Est. No. 071106-GA-001 CO-5-00212-00