

64240-46

09/23/2008

1/11



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

SEP 23 2008

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,

A handwritten signature in black ink, appearing to be "Linda Arrington".

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

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other: Notification	OPP Identifier Number <div style="text-align: center; font-size: 1.2em;">265394</div>
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Application for Pesticide - Section I

1. Company/Product Number 64240-46	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Streamlined Roach Bait	PM# Team 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 15101 N. Scottsdale Road Scottsdale, AZ 85254-2199 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(1), my product is similar or identical in composition and labeling to: <div style="text-align: center; font-size: 1.5em; font-weight: bold;">NOTIFICATION</div> EPA Reg. No. _____ <div style="text-align: center; font-size: 1.2em; font-weight: bold;">SEP 23 2008</div> 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 OF MINOR LABEL CHANGES PER PR NOTICE 98-10

Notification of MINOR LABELCHANGES in Accordance With PR Notice 98-10

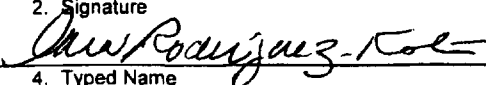
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false 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.

Signature: Ana Rodriguez-Koster Date: 7/23/08

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"/> Other _____	
				<input type="checkbox"/> Lithograph <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: Ana Rodriguez-Koster, Lewis and Harrison, LLC 122 C St., NW Suite 740 Washington, DC 20001	Title: Agent for Combat Insect Control Systems	Telephone No. (Include Area Code): (202) 393-3903 ext. 17
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 Systems	
4. Typed Name Ana Rodriguez-Koster, Lewis & Harrison LLC	5. Date <div style="text-align: center;">7/23/2008</div>	

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 23, 2008

HAND DELIVERED

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**ATTENTION: Richard Gebken
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems
Combat Streamlined Roach Bait (EPA Reg. No. 64240-46)
Notification of Minor Label Changes per PR Notice 98-10**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a Notification of minor label changes for their end-use product, **Combat Streamlined Roach Bait (EPA Reg. No. 64240-46)**. The purpose of this Notification is to make the following minor changes to the product label:

1. Incorporation of revisions requested by the Agency's Notice of Pesticide Registration dated 6/23/2008 (copy attached).
2. Incorporation of an alternate brand name ("ABN") that was notified to the Agency on 6/26/2008;
3. Addition of marketing language and graphics. Please note that the added marketing language simply rephrases the marketing language present in the latest EPA stamped accepted label dated 6/23/2008.
4. Re-categorization of certain approved (non-boiler plate) language as alternate language.

* Regarding the following comment that the Agency noted in the Notice of Pesticide Registration: "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." please note that at this time Combat is not incorporating this language into the master label for **Combat Streamlined Roach Bait** given that this language was indeed removed from the cited/similar product, **Combat Roach Killing System (EPA Reg. No. 64240-2)** on 7/19/2007 via Notification. I'm including a copy of the 7/19/2007 Notification for **Combat Roach Killing System (EPA Reg. No. 64240-2)** as well as the Agency's approval for your reference.

Please note that all additions / revisions involve no changes to the ingredients statement, signal word, use classification, precautionary statements, first aid, physical/chemical properties, or storage and disposal language. Furthermore, the additions do not substitute for or conflict with label text, and are not false or misleading.

Enclosed please find the following documents in support of this submission:

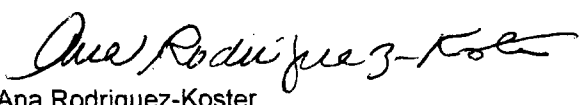
1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the proposed Master Label, with changes highlighted;
3. One (1) clean copy of the proposed Master Label; and,
4. Two (2) copies of the proposed final printed label.

4/11

Thank you for your assistance with this Notification. If you have any questions, please call me at 202-393-3903 x.17 or e-mail me at alkoster@lewisharrison.com.

Sincerely,

416 579-4848
17



Ana Rodriguez-Koster
Agent for Combat Insect Control Systems

Enclosures

cc: David Rickard, Henkel Consumer Goods Inc.

Underlined text is new

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

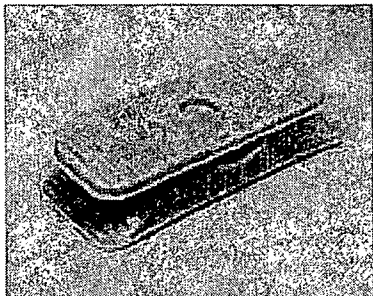
[Bracketed information is optional text]

~~Strikethroughs~~ indicate deleted text

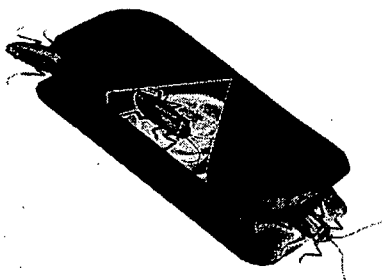
Master Label, JULY, 2008
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 1 of 7

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.]

6/11

Underlined text is new

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
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 2 of 7

[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.]

7/11

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[Bracketed information is optional text]

~~Strikethroughs~~ indicate deleted text

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.

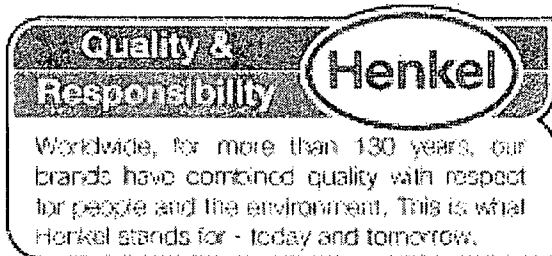
FIRST AID: If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. 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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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
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 4 of 7

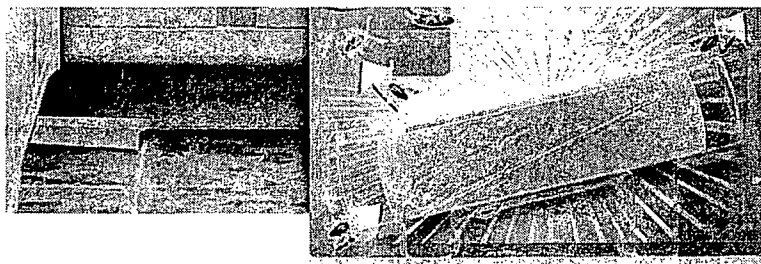
DIRECTIONS FOR USE

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.]

9/11

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[Bracketed information is optional text]

~~Strikethroughs indicate deleted text~~

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.]



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[Bracketed information is optional text]

~~Strikethroughs indicate deleted text~~

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 call the COMBAT® [Information] Helpline at 1-800-426-6228 for [more] information.]]
Questions or Comments? Call 1-800-426-6228

Underlined text is new

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
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 7 of 7

UNIT LABEL

COMBAT[®] 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[®], please call 1-800-426-6228] [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]

Distributed by & ©2008 Combat Insect Control Systems
[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]