

64240-46

3/19/2009

1/8

MAR 19 2009

Ms. Georgia Anastasiou, Agent
Combat Insect Systems
c/o Lewis and Harrison
122 C Street, N.W. Suite 740
Washington, D.C. 20001

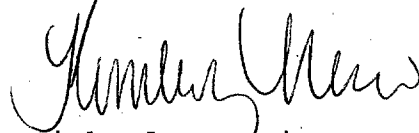
Subject: Label Amendment/Response to Agency's
November 12, 2008, Letter
Combat Streamlined Roach Bait
EPA Registration Number: 64240-46
Application Date: December 29, 2008

Dear Ms. Anastasiou:

The labeling referred to above, submitted in connection
with registration under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended, is acceptable.

A stamped copy of the label is enclosed.

Sincerely,



Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division (7505P)

Enclosure: Stamped Accepted Label

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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]

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Master Label, December 29, 2008

EPA Reg. No. 64240-46

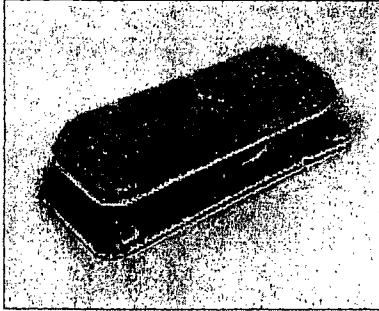
Combat Streamlined Roach Bait

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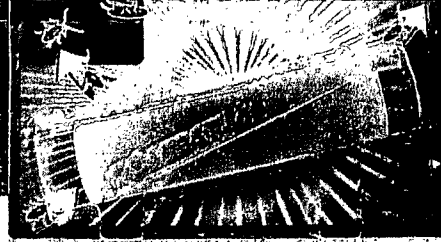
COMBAT[®] Streamlined Roach Bait

Alternate Brand Names:

Combat Discreet Roach Baits -or- Combat Discreet Kill Roach Baits



-or-



[Kills][For] Small Roaches

-or-

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

-or-

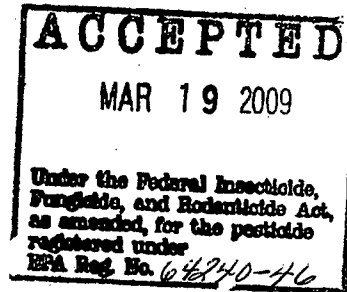
[Kills][For] Small Roaches and Large Roaches[, Waterbugs & Palmetto Bugs]

[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. _____

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[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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Combat Streamlined Roach Bait

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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:

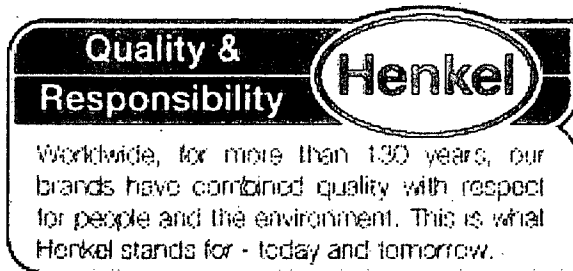
[Combat®] [Guaranteed to work [or your money back]!

[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.]



-or-



{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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Combat Streamlined Roach Bait

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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 Discreet Roach Baits] [Combat Discreet Kill 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.]

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Master Label, December 29, 2008

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Combat Streamlined Roach Bait

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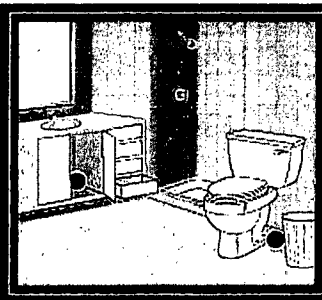
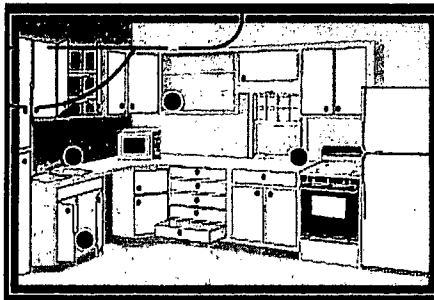
DIRECTIONS FOR USE, *continued*

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove label on bait stations.

APPLICATION INSTRUCTIONS

1. Use all [2] [4] [6] [8] [12] [16] [18] bait[s] [stations] [at the same time]
2. [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.]
3. 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.]
4. 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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Combat Streamlined Roach Bait

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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***
- *** vs. standard size of this [Combat] product
*** vs. standard size of this [Combat] product
*** vs. standard size of this [Combat] product
*** vs. standard size of this [Combat] product
*** vs. standard size of this [Combat] product
*** 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

Miscellaneous claims:

- Roaches eat the bait, return to the nest, share the bait [insecticide] with others, and eradicate the nest.
- For large and small roaches

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

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Claims for Front or Back:

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 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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Combat Streamlined Roach Bait

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UNIT LABEL

COMBAT[®] Streamlined Roach Bait

Alternate Brand Names:

Combat Discreet Roach Baits -or- Combat Discreet Kill Roach Baits

[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[®], 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]

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[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254

MADE IN USA

EPA Reg. No. 64240-46

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)]