



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 21 2009

Ms. Georgia Anastasiou
Lewis & Harrison, LLC
122 C St. NW #740
Washington, DC 20001

RE: Notification of Alternate Brand Name: **Combat Source Kill Roach Killing Bait 4**
EPA Registration Number: 64240-46
Date of Submission: April 6, 2009

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 6, 2009, for the product, Combat Streamlined Roach Bait. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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 Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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

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

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 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 64240-46	2. EPA Product Manager Kimberly Nesci	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Streamlined Roach Bait	PM# 11	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15501 N. Scottsdale Road Scottsdale, AZ 85260 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)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
NOTIFICATION
MAY 21 2009

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.)

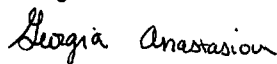
NOTIFICATION OF ALTERNATE BRAND NAME: Combat Source Kill Roach Killing Bait 4

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 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.

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 If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
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"/> Lithograph <input type="checkbox"/> Other _____ <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 Georgia Anastasiou - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 19
Certification 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 System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date April 6, 2009	

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

April 6, 2009

HAND DELIVERED

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

**ATTENTION: Kimberly Nesci
Product Manager, Team 11**

**SUBJECT: Combat Insect Control Systems
Combat Streamlined Roach Bait (EPA Reg. No. 64240-46)
Notification per PR Notice 98-10: Alternate Brand Name**

Dear Mr. Gebken:

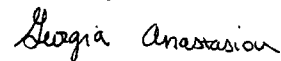
On behalf of Combat Insect Control Systems ("Combat"), we are submitting a notification to propose the following alternate brand name for the product Combat Streamlined Roach Bait (EPA Reg. No. 64240-46):

Combat Source Kill Roach Killing Bait 4

In support of this submission enclosed please find an Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10 and one copy of the label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com. I thank you in advance for your cooperation.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

[Faint, illegible markings or bleed-through at the bottom right of the page]

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, March 19, 2009

EPA Reg. No. 64240-46

Combat Streamlined Roach Bait

Pg 1 of 7

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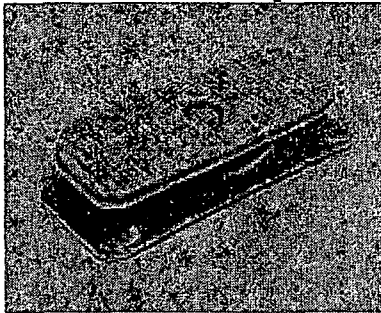
COMBAT® Streamlined Roach Bait

Current Alternate Brand Names:

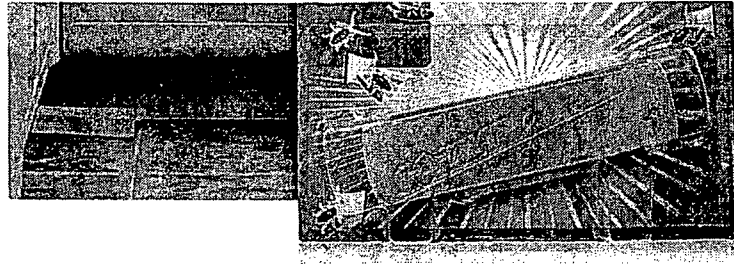
[Combat Discreet Roach Baits -or- Combat Discreet Kill Roach Baits]

Proposed Alternate Brand Name:

[Combat Source Kill Roach Killing Bait 4]



-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]

NOTIFICATION

MAY 21 2009

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.]

[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, March 19, 2009

EPA Reg. No. 64240-46

Combat Streamlined Roach Bait

Pg 2 of 7

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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:

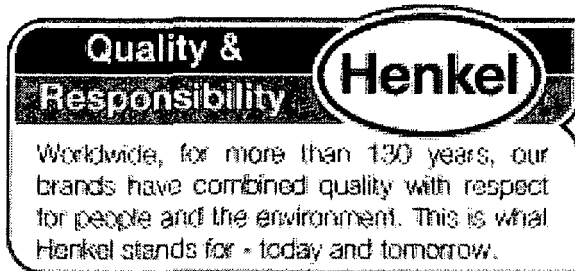
[Combat®] [Guaranteed to work [or your money back]!

[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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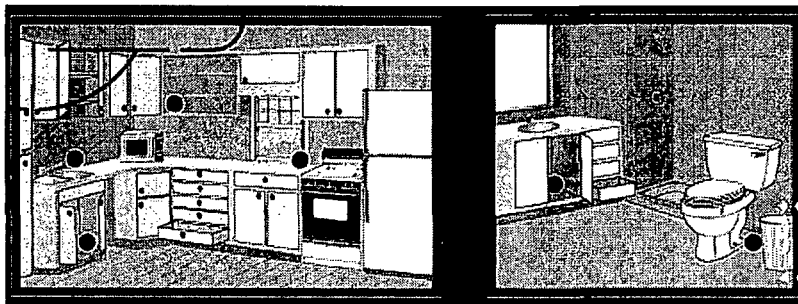
DIRECTIONS FOR USE, *continued*

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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[Bracketed information is optional text]

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Master Label, March 19, 2009

EPA Reg. No. 64240-46

Combat Streamlined Roach Bait

Pg 5 of 7

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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]*** *** 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

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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Master Label, March 19, 2009

EPA Reg. No. 64240-46

Combat Streamlined Roach Bait

Pg 6 of 7

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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 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, March 19, 2009 ¹⁰/₁₀

EPA Reg. No. 64240-46

Combat Streamlined Roach Bait

Pg 7 of 7

UNIT LABEL

NOTIFICATION

MAY 21 2009

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]

Distributed by & ©2008 Combat Insect Control Systems
[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)]

