

64240-46



11/10/2009
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

1/7

NOV 10 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Georgia Anastasiou
Lewis & Harrison
122 C Street N. W. Suite 740
Washington, D.C. 20001

Dear Ms. Anastasiou:

Subject: Label Amendment
Combat® Streamline Roach Bait
EPA Registration Number: 64240-46
Application Dated: August 3, 2009
Decision: 418562

The Agency has considered your request to maintain the following marketing claim: "Advanced [food] formula§ § [versus] [vs] the previous Combat bait formula" on your product labeling. This letter supersedes the Agency letter dated October 28, 2009. A copy of this letter has been placed in the file for this product.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy of this review has been placed in your file.

If you have any questions, please contact Melody Banks on 703 305-5413.

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly Nesci".

Kimberly Nesci
Product Manager 11
Insecticide Branch
Registration Division 7507P

Enclosure: Copy of Product Chemistry Review

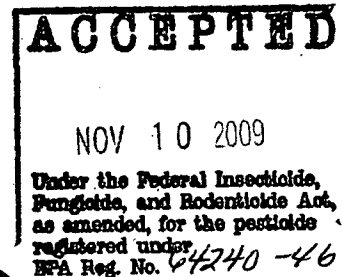
Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text]

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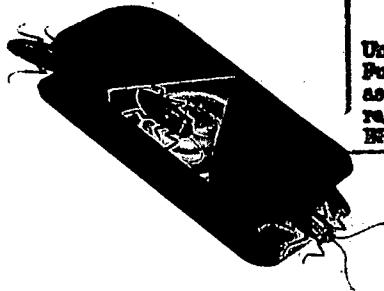
COMBAT[®] Streamlined Roach Bait

Alternate Brand Names:

- Combat Discreet Roach Baits**
- Combat Discreet Kill Roach Baits**
- Combat Hideaway Roach Baits**
- Combat Source Kill 5**



-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.]

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Distributed by & ©2009 Combat Insect Control Systems
[19001 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] [85255]
[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 baits in areas inaccessible to pets.

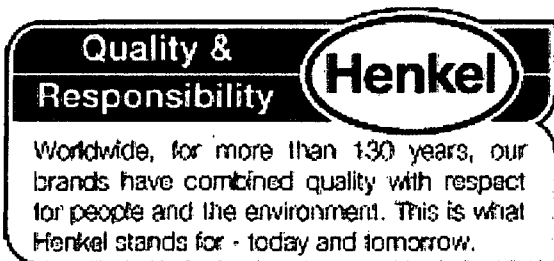
FIRST AID: If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.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

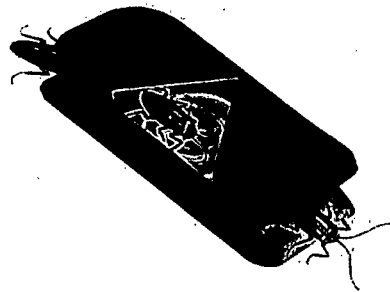
{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}

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

[THIS IS] [HOW] [THIS] COMBAT® [*Alternate Brand Name*] 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

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

APPLICATION INSTRUCTIONS

1. Use all [2] [4] [6] [8] [12] [16] [18] bait[s] [station[s].] [at the same time.] [Remove wrapper.] Do not remove [the] label[s] on bait station[s]. Place bait[s] [station[s]] 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 1/2 feet away.]
[The more bait stations placed out, the more roaches find the bait.]
3. Replace all [2] [4] [6] [8] [12] [16] [18] bait[s] [station[s]] [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:

Value claims (not to exceed 18):

- Bonus Pack***
- 50% More [Free]***
- 100% More [Free]***
- [50%] More Baits***
- [100%] More Baits***
- [4] [8] Bonus Baits With Purchase
- More Baits – Better Value***
- Value Pack – More Baits***

*** vs. [standard size] [8] [count] [ct.] [package] [pkg.] [of this [Combat] product]

Appearance claims:

- [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] [and] [furniture] [and] [underneath] [under] [cabinets] [and] [cupboards] [vanities]

Miscellaneous claims:

- Roaches eat the bait, return to the nest, share the bait [insecticide] with others, and eradicate the nest.
- For large or small roaches
- 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
- Advanced [food] formula* *[versus] [vs.] the previous Combat bait formula

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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UNIT LABEL

COMBAT[®] Streamlined Roach Bait

Alternate Brand Names:

Combat Discreet Roach Baits
Combat Discreet Kill Roach Baits
Combat Hideaway Roach Baits
Combat Source Kill Max 5

[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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[19001 N. Scottsdale Rd.,] Scottsdale, AZ 85255
MADE IN USA

EPA Reg. No. 64240-46
EPA Est. No. _____

SEE OUTER CARTON FOR [COMPLETE DIRECTIONS AND PRECAUTIONS] [ADDITIONAL
PRECAUTIONARY STATEMENTS]

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

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