

64240-46

6/10/2010

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 10, 2010

Ms. Georgia Anastasiou
Combat Insect Control Solutions
c/o Henkel Consumer Goods, Inc.
19001 N. Scottsdale Road
Scottsdale, AZ 85225

Subject: Label Notification(s) for Pesticide Registration Notice 98-10

Dear Ms. Anastasiou:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 98-10 dated May 5, 2010 for the following product(s):

Combat Streamlined Roach Bait

EPA Reg. No. 64240-46

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee-Smith at 703-605-0780.

Sincerely,

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

 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 Mark Suarez	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 c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 <i>NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</i> <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. <u> NOTIFICATION </u> Product Name <u> JUN 10 2010 </u>	

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 to Add Marketing Language

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	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"/> Lithograph <input type="checkbox"/> Other _____		
			<input type="checkbox"/> Paper glued		
			<input type="checkbox"/> Stenciled		

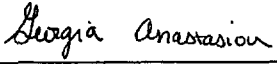
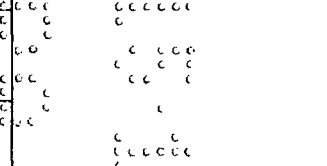
Section - IV

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
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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.

2. Signature 	3. Title Agent for Combat Insect Control System	6. Date Application Received (Stamped) 
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date May 5, 2010	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

May 5, 2010

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: Mark Suarez
Product Manager, Team 11

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

Dear Mr. Suarez:

On behalf of Combat Insect Control Systems, I am submitting a notification for the product **Combat Streamlined Roach Bait (EPA Reg. No. 64240-46)**. The purpose of this notification is to add marketing language for a new bait design.

In support of this submission enclosed please find the following documents:

- 1) Application for Pesticide Notification;
- 2) One (1) copy of the revised label with the changes highlighted; and,
- 3) Two (2) copies of the revised 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

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

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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, May 5, 2010
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 1 of 6

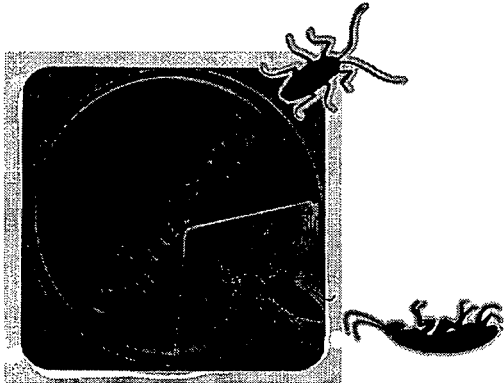
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COMBAT® Streamlined Roach Bait

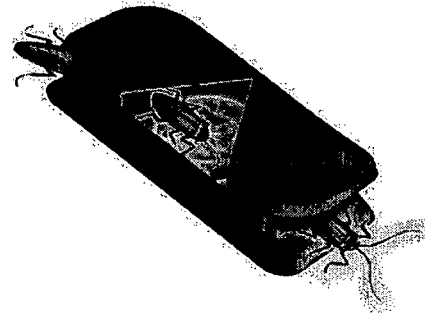
Previously Alternate Brand Names:
Combat Discreet Roach Baits
Combat Discreet Kill Roach Baits
Combat Hideaway Roach Baits
Combat Source Kill 5

NOTIFICATION

JUN 10 2010



-or-



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

-or-

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

[NEW DESIGN!] Designed for Small & Large Roaches

[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.]

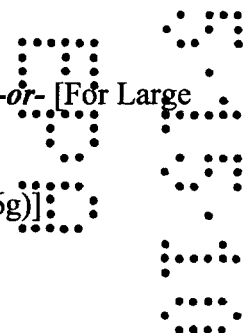
EPA Reg. No. 64240-46 EPA Est. No. _____

Distributed by & ©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 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]!

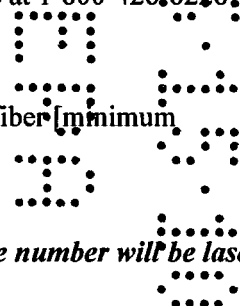
[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[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.]



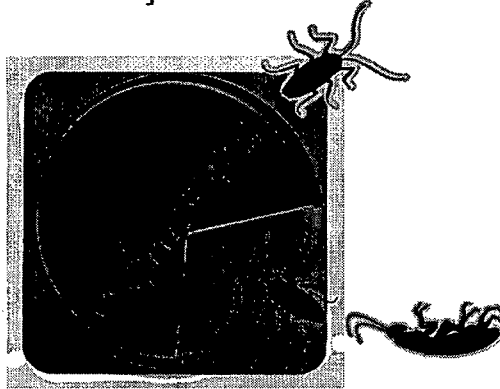
{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}

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

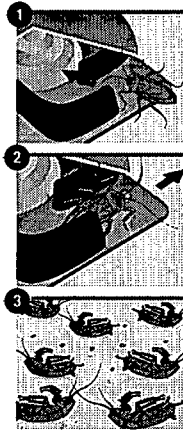
[GENERAL INFORMATION]

[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.]



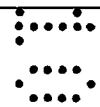
-and/or-



[This product is specifically designed for roaches. [small roaches.] [large roaches] [large roaches, waterbugs & palmetto bugs.] [small and large roaches.]

This roach bait is designed for small AND large roaches. [Use the pictures below to identify which type of pest you have.]

	<p>Large (Waterbugs, Palmetto bugs), 1"-1 1/2" Cockroach. Habits: Primary live and breed outdoors and enter homes in search of food. Bait station placement near potential points of entry is key</p>		<p>Small, 1/2" Cockroach... Habits: Primary live and breed in moist areas like kitchens and bathrooms. More bait stations are required for effective control.</p>
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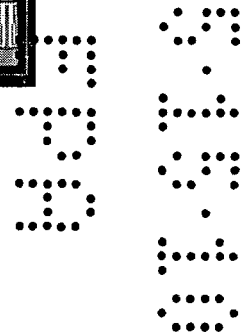
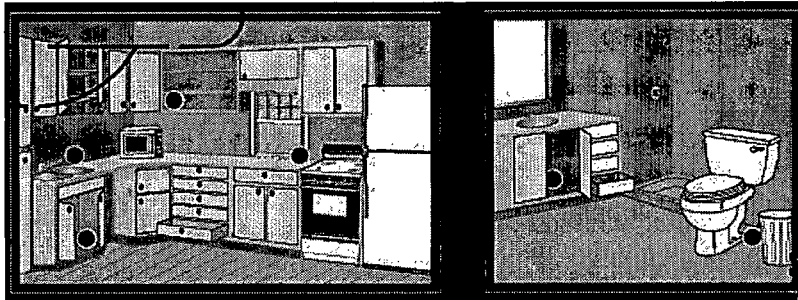
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DIRECTIONS FOR USE

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 ½ 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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[Bracketed information is optional text]
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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:

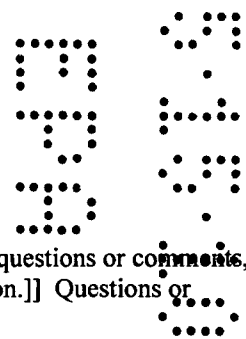
- Roaches eat the bait, return to the nest, share the bait [insecticide] with others, and eradicate the nest.
- For large or small roaches
- Ideal for use against [large][and][small]roaches
- Laboratory and home use tests prove COMBAT® [*Alternate Brand Name*] provides 3 months of effective control (for 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.] previous 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 call all the COMBAT® [Information] Helpline at 1-800-426-6228 for [more] information.]] Questions or Comments? Call 1-800-426-6228

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, May 5, 2010
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 6 of 6

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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 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 & ©2010 Combat Insect Control Systems
[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)]

