

64240-46

7/9/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms Georgia Anastasiou  
Agent for Combat Insect Systems  
Lewis & Harrison  
122 C Street N W Suite 740  
Washington DC 20001

JUL 9 2012

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 June 26 2012 for the following product(s)


**Combat Roach Killing Bait      Alternate Brand Name**

The Registration Division (RD) has conducted a review of this request for applicability under PR Notice 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.

**Combat<sup>o</sup> Streamlined Roach Bait      EPA Reg No 64240 46**

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely

  
Richard J Gebken  
Product Manager  
Insecticide Branch  
Registration Division (7504P)

2019

Please read instructions on reverse before completing form

Form Approved OMB No 2070 0060 Approval expires 05 31 98

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

1 Company/Product Number <b>64240-46</b>	2 EPA Product Manager <b>Mark Suarez</b>	3 Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) <b>Combat Streamlined Roach Bait</b>	PM# <b>11</b>	
5 Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems</b> <b>c/o Henkel Consumer Goods Inc</b> <b>19001 N Scottsdale Rd</b> <b>Scottsdale AZ 85255</b> <i>NOTE PLEASE SEND ALL CORRESPONDENCE TO CONTACT POINT LISTED BELOW</i> <input type="checkbox"/> Check if this is a new address	6 <b>Expedited Review</b> In accordance with FIFRA Section 3(c)(3) (b)(I) my product is similar or identical in composition and labeling to <div style="text-align: center;"><b>NOTIFICATION</b></div> EPA Reg No _____ <div style="text-align: center;"><b>JUL - 3 2012</b></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"/> <b>Notification Explain below</b>	<input type="checkbox"/> Other Explain below

**Explanation** Use additional page(s) if necessary (For Section I and Section II)

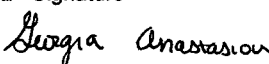
**Notification of the Alternate Brand Name Combat Roach Killing Bait**

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			
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	2 Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
<b>*Certification must be submitted</b>			
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 <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b> <b>122 C St NW #740 Washington DC 20001</b>	Title <b>Agent for Combat Insect Control Systems</b>	Telephone No (Include Area Code) <b>202 393 3903 ext 19</b>	
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 <div style="text-align: center;"><b>(Stamped)</b></div>
2 Signature 	3 Title <b>Agent for Combat Insect Control System</b>		
4 Typed Name <b>Georgia Anastasiou Lewis &amp; Harrison LLC</b>	5 Date <div style="text-align: center;"><b>June 26 2012</b></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

June 26 2012

**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 Alternate Brand Name**

Dear Mr Suarez

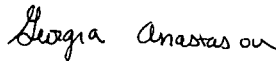
On behalf of Combat Insect Control Systems I submitting a notification to propose the following alternate brand name for the product Combat Streamlined Roach Bait (EPA Reg No 64240 46)

### **Combat Roach Killing Bait**

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 a copy of the master label with the proposed brand name

If you have any questions please contact me at 202 393 3903 ext 19 or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com)

Sincerely



Georgia Anastasiou  
Agent for  
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

4029

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 June 26 2012  
EPA Reg No 64240-46  
Combat Streamlined Roach Bait  
Pg 1 of 6

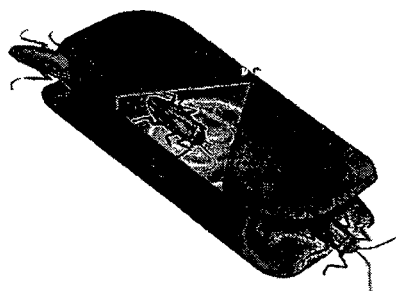
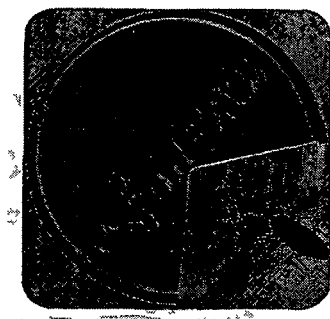
# COMBAT® Streamlined Roach Bait

*Approved Alternate Brand Names*  
**Combat Discreet Roach Baits**  
**Combat Discreet Kill Roach Baits**  
**Combat Hideaway Roach Baits**  
**Combat Source Kill 5**

*Proposed Alternate Brand Name*  
**Combat Roach Killing Bait**



-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 Hydamethylnon† 2 0%  
OTHER INGREDIENTS 98 0%  
†CAS No 67485 29 4

**NOTIFICATION**

**JUL - 9 2012**

**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

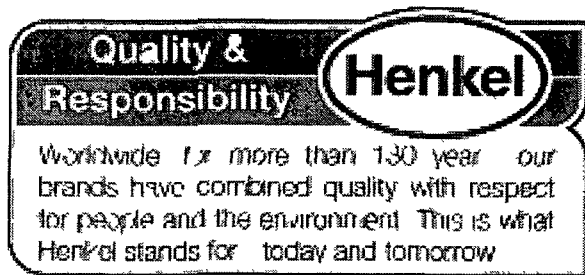
**FIRST AID** If on skin or clothing Take off contaminated clothing Rinse skin immediately with plenty of water for 15 20 minutes Call a poison control center or doctor for treatment advice Have the product container or label with you when calling a poison control center or doctor or going for treatment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

6049

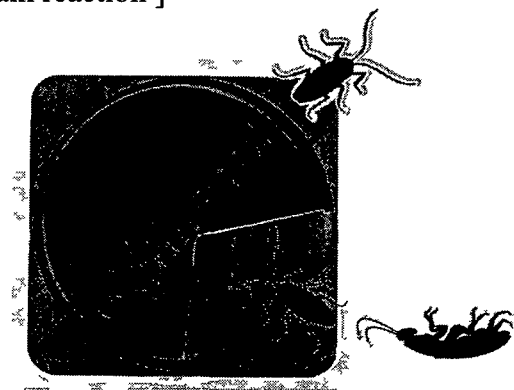
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Master Label June 26 2012  
EPA Reg No 64240-46  
Combat Streamlined Roach Bait  
Pg 3 of 6

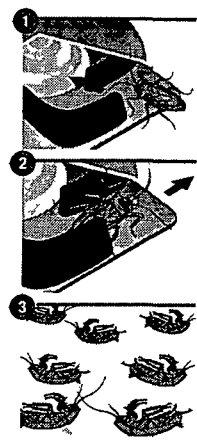
[GENERAL INFORMATION]

[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>Actual Size</p> <p>Large (Waterbugs Palmetto bugs) 1 1 ½ 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>Actual Size</p> <p>Small ½ 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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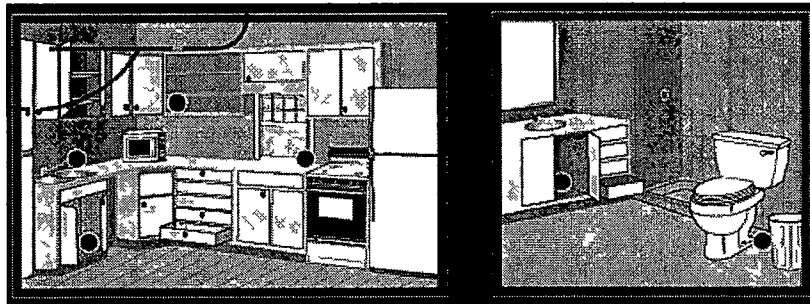
Master Label June 26 2012  
EPA Reg No 64240-46  
Combat Streamlined Roach Bait  
Pg 4 of 6

### 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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**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 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 June 26 2012  
EPA Reg No 64240-46  
Combat Streamlined Roach Bait  
Pg 6 of 6

UNIT LABEL

**COMBAT® Streamlined Roach Bait**

*Approved Alternate Brand Names*

**Combat Discreet Roach Baits**

**Combat Discreet Kill Roach Baits**

**Combat Hideaway Roach Baits**

**Combat Source Kill 5**

*Proposed Alternate Brand Name*

**Combat Roach Killing Bait**

**[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<sup>†</sup> 2 0%  
OTHER INGREDIENTS 98 0%  
<sup>†</sup>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)]