

64240-46

11/20/2012

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

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 20 2012

Ms. Georgia Anastasiou
Lewis and Harrison
Agent for Combat Insect Control Systems
122 C Street N.W.
Suite 505
Washington, D.C. 20001

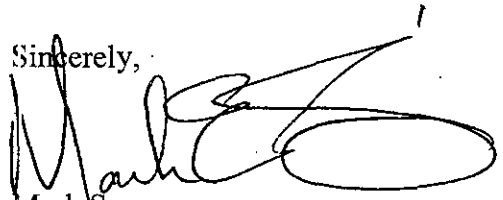
Subject: Label Notification(s) for Pesticide Registration 98-10

Dear Ms. Anastasiou:

Subject: Notification to Make Label Changes
EPA Registration Number: 64240-46
Date of Submission: September: September 18, 2012

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 18, 2012 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 action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has (have been stamped "Notification" and will be placed in our records.

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

Sincerely,

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7504P)

LEWIS & HARRISON

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

Consultants in Government Affairs
September 18, 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**

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 make minor revisions to the label. The revisions include addition of non-FIFRA language, clarifying which language is considered optional, revisions to the graphics, minor changes to the marketing language and correcting the language on the bait station label.

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

- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted;
- 3) Two (2) copies of the revised label; and,
- 4) PDF copy of the revised label.

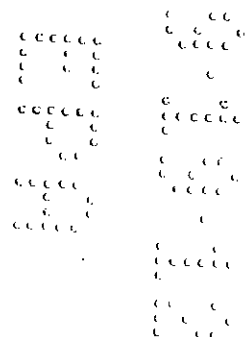
If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for Combat Insect Control Systems

cc: Patricia McFadden (Combat Insect Control Systems)



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

Label, September 13, 2012
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 1 of 6

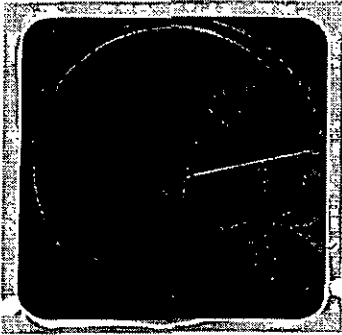
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COMBAT[®] Streamlined Roach Bait

Approved Alternate Brand Names:
Combat Discreet Roach Baits
Combat Discreet Kill Roach Baits
Combat Hideaway Roach Baits
Combat Source Kill 5
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: 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. _____

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems[®]
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

[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)]

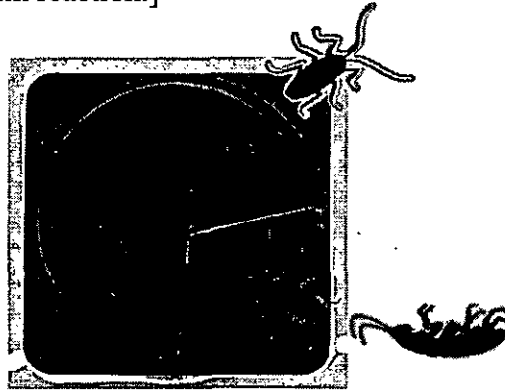
[U.S. Patent Nos. _____ [and other patents pending.]]

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[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.]

Optional Chart

 Actual Size	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	 Actual Size	Small, 1/2" Cockroach. Habits: Primary live and breed in moist areas like kitchens and bathrooms. More bait stations are required for effective control
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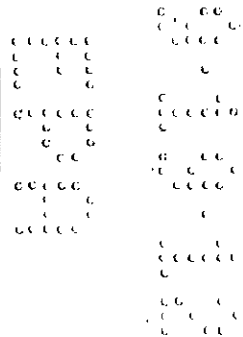
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DIRECTIONS FOR USE

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] [stations.] [at the same time.] [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.]
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] [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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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.~~

Optional 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:

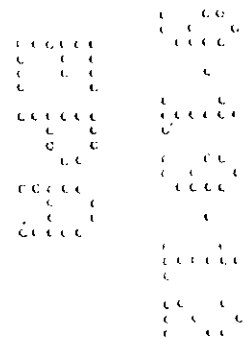
- [A][roach][bait][station]you will hardly notice
- Discreet [design][roach baits]
- For discreet roach control
- Designed to kill roaches discreetly
- [Simple] [streamlined] [rectangular] [design] Fits discreetly [behind] [appliances] [and] [furniture] [and] [underneath] [under] [cabinets] [and] [cupboards] [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 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.***
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Label, September 13, 2012
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 6 of 6

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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
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 or puncture 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 call all the COMBAT[®] Information Helpline at 1-800-426-6228 for more information.] [Questions or Comments? Call 1-800-426-6228]

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

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)]

