

64240-46

06/19/2013

1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 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

JUN 19 2013

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 10, 2013 for the following product(s):

**Combat Streamlined Roach Bait**

**Reg. No. 64240-46**

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.

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


Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

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

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 Lewis &amp; Harrison, LLC</b> <b>122 C Street, Suite 505</b> <b>Washington, DC 20001</b> <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 to: <b>NOTIFICATION</b> EPA Reg. No. _____ <b>JUN 19 2013</b> 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 to make minor changes to the label. Please read cover letter for details.**  
 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 <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC</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 (Stamped)
2. Signature <i>Georgia Anastasiou</i>		
3. Title <b>Agent for Combat Insect Control System</b>		
4. Typed Name <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC</b>		
		5. Date <b>6/10/2013</b>

# 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

June 10, 2013

**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 the following changes to the label:

1. Remove the language "New Design".
2. Correct the language in the Precautionary statements by removing the word "hands".
3. Add the marketing language "[Destroys] [kills] the nest". Please note this language is a reiteration of claims that are currently approved.

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

- a) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- b) One (1) copy of the label with changes highlighted; and,
- c) ~~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](mailto:georgia@lewisharrison.com).

Sincerely,

*Georgia Anastasiou*

Georgia Anastasiou  
Agent for Combat Insect Control Systems

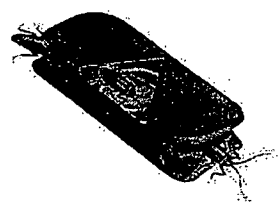
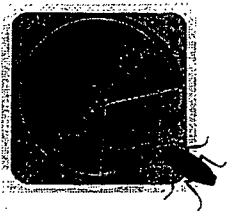
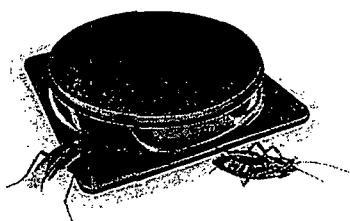
cc: Patricia McFadden (Combat Insect Control Systems)

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

Master Label, June 10, 2013  
EPA Reg. No. 64240-46  
Combat Streamlined Roach Bait  
Pg 1 of 7

# 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**



**[Kills][For] Small Roaches -or- [Kills][For] Large Roaches[, Waterbugs & Palmetto Bugs] -or-  
[Kills][For] Small [Roaches] [and] [&] Large Roaches[, Waterbugs & Palmetto Bugs]  
Designed for Small & Large Roaches**

[ROACH]

ACTIVE INGREDIENT: Hydramethylnon† .....2.0%  
OTHER INGREDIENTS: .....98.0%  
†CAS No. 67485-29-4

**NOTIFICATION**  
**JUN 19 2013**

**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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Master Label, June 10, 2013  
EPA Reg. No. 64240-46  
Combat Streamlined Roach Bait  
Pg 2 of 7

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water, and 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.

*{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.}*

*Optional Henkel statement 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,] [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].]

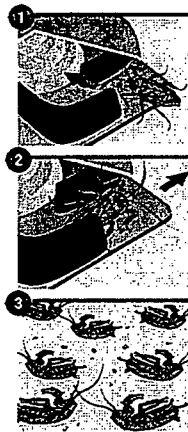
[♻️] [[The paperboard in] [this] [C]carton [contains] [is made from] \_\_\_\_\_% Recycled fiber [minimum \_\_\_\_\_% post consumer content]] [Please Recycle Empty Carton.]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

[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.]



[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*

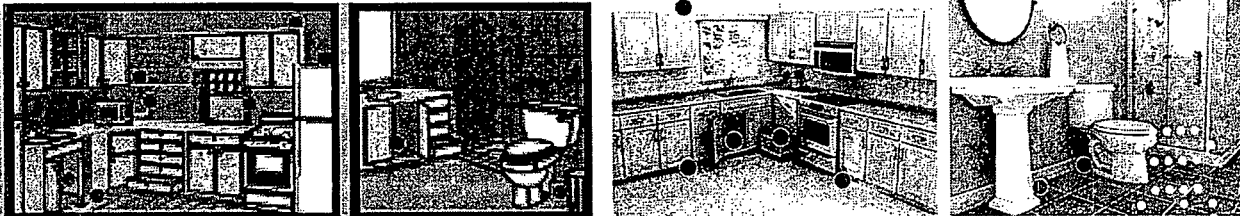
 Actual Size	Large (Waterbugs, Palmetto bugs), 1"-1 1/2" Cockroach. Habits: Primary live and breed outdoors and enter homes in search of food. Bait station placement near potential points of entry is key	 Actual Size	Small, 1/2" Cockroach. Habits: Primary live and breed in moist areas like kitchens and bathrooms. More bait stations are required for effective control.
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## 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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[Bracketed information is optional text]  
~~Strike~~throughs indicate deleted text

Master Label, June 10, 2013  
EPA Reg. No. 64240-46  
Combat Streamlined Roach Bait  
Pg 6 of 7

- Kills roaches & eggs for 3 months
- Kills roaches at their source
- Three months effective control
- [Destroys] [kills] the nest

***For Large Roaches:***

- Kills roaches at their source
- Large bait kills large roaches
- Solves large roach problems
- [Destroys] [kills] the nest
- 

[Should you have any questions regarding COMBAT<sup>®</sup>, please call 1-800-426-6228, *-or-* [For questions or comments, please call the COMBAT<sup>®</sup> [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]  
~~Strikethroughs indicate deleted text~~

10/10  
Master Label, June 10, 2013  
EPA Reg. No. 64240-46  
Combat Streamlined Roach Bait  
Pg 7 of 7

**UNIT LABEL**

**COMBAT<sup>®</sup> 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<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<sup>®</sup>, please call 1-800-426-6228] [For questions or comments, please c] [C]all the COMBAT<sup>®</sup> 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)]