



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 19, 2016

Georgia Anastasiou
Agent for Combat Insect Control Systems
c/o Lewis & Harrison
122 C Street, N.W. Suite 505
Washington, DC 20001

Subject: Label Amendment – Revising company address, adding claims, and adding marketing statements.
Product Name: Combat Streamlined Roach Bait
EPA Registration Number: 64240-46
Application Date: October 15, 2015
Decision Number: 510504

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

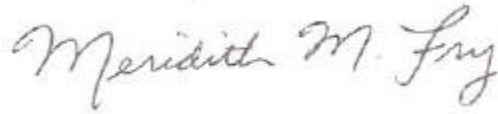
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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Decision No. 510504

with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Meredith M. Fry". The ink is dark and the signature is centered on the page.

Meridith M. Fry, Ph.D., Product Manager 4
Invertebrate & Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

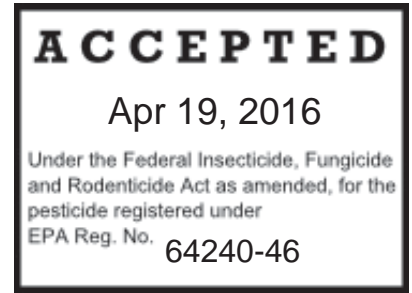
Enclosure

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, April 14, 2016
EPA Reg. No. 64240-46
Combat Streamlined Roach Bait
Pg 1 of 8

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

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] [&] © [Year] Combat Insect Control Systems
[7201 E. Henkel Way] 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.[:] _____

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

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

PESTICIDE STORAGE: Store in cool, dry area out of reach of children.

CONTAINER HANDLING: **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.

{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].]



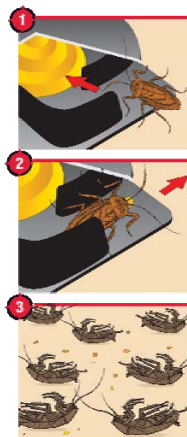
[[The paperboard in] [this] [C]carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content]] [Please Recycle Empty Carton.]

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

[USE 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

	<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>Small, ½" Cockroach. Habits: Primary live and breed in moist areas like kitchens and bathrooms. More bait stations are required for effective control.</p>
Actual Size		Actual Size	

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.]



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***
- [x] [x [Bait]] [[x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X][Extra] [Free] [Bonus] [Bait(s)]^{††} [With Purchase] ^{††} [for free]
- More Baits [– Better Value]
- Value Pack [– More Baits]
- Value Size [– More Baits]
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack

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

^{††} vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

Claims:

- Trial Size
- Prevention Pack
- Value Size
- For [small] [minor] [roach] infestations only
- [Roach] [Bait] Trial Pack
- [Use] [For] [on] [a] [Small] [minor] [roach] [Colony] [nest] [Use]
- New [Size] [Bait Count]
- 2-Pack
- Recommended for [small homes] [or] [apartments]
- Perfect for apartments [with a minor [small] [roach] infestation]
- Perfect for [a] small[er] home[s] [with a minor [small] [roach] infestation]
- Recommended for small [minor] [roach] infestations
- Use all baits [, recommend for small infestations,] larger infestations may require more [bait stations] [than one box].
- Moderate [or severe] roach problems may require 2 boxes [or more].
- Number of bait stations needed varies depending on the size of the infestation.

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

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
- [Destroys] [kills] the nest
- Kills roaches 24/7 for up to 3 months
- Keeps on killing[for] up to 3 months
- Kills non-stop [for] up to 3 months
- Effective killing [for] up to 3 months

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[®], 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.***

[Bracketed information is optional text]

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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

CONTAINER HANDLING: 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]

[Manufactured for] [Distributed by] [&] © [Year] Combat Insect Control Systems

[7201 E. Henkel Way] 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]

[Total] NET WT. _____