

64240-47

09/25/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 25 2008

Ms. Ana Rodriguez-Koster
Lewis & Harrison, LLC
For Combat Control Systems
122 C. Street NW # 740
Washington, D.C. 20001

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Alternate Brand Name "Combat Discreet Roach Baits and Combat
Discreet Kill Roach Baits"
and General Label Changes
EPA Reg. 64240-47
Application Dated July 23, 2008

Dear Registrant:


The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/23/08 for the above product. 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 label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

| | | | |
|--|---|---|--|
|  EPA | United States Environmental Protection Agency Washington, DC 20460 | <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other: Notification | OPP Identifier Number 265394 |
|--|---|---|--|

Application for Pesticide - Section I

| | | |
|---|---|--|
| 1. Company/Product Number 64240-47 | 2. EPA Product Manager Richard Gebken | 3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Combat Small Roach Deco Bait | PM# Team 10 | |
| 5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 15101 N. Scottsdale Road Scottsdale, AZ 85254-2199 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <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. _____ NOTIFICATION _____ Product Name _____ SEP 25 2008 _____ |

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 OF MINOR LABEL CHANGES PER PR-NOTICE 98-10

Notification of MINOR LABELCHANGES in Accordance With PR Notice 98-10

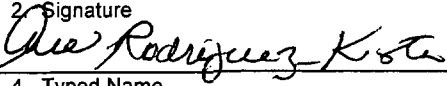
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false 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.

Signature: *Ana Rodriguez-Koster* Date: 7/23/08

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

Section - IV

| | | |
|--|--|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application) | | |
| Name: Ana Rodriguez-Koster, Lewis and Harrison, LLC 122 C St., NW Suite 740 Washington, DC 20001 | Title: Agent for Combat Insect Control Systems | Telephone No. (Include Area Code): (202) 393-3903 ext. 17 |
| Certification | | 6. Date Application Received (Stamped) |
| I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete, 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 Systems | |
| 4. Typed Name Ana Rodriguez-Koster, Lewis & Harrison LLC | 5. Date 7/23/2008 | |

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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

July 23, 2008

HAND DELIVERED

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**ATTENTION: Richard Gebken
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems
Combat Small Roach Deco Bait (EPA Reg. No. 64240-47)
Notification of Minor Label Changes per PR Notice 98-10**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a Notification of minor label changes for their end-use product, **Combat Small Roach Deco Bait (EPA Reg. No. 64240-47)**. The purpose of this Notification is to make the following minor changes to the product label:

1. Incorporation of revisions requested by the Agency's Notice of Pesticide Registration dated 6/23/2008 (copy attached).
2. Incorporation of two alternate brand names ("ABNs") that were notified to the Agency on 6/26/2008.
3. Addition of marketing language and graphics. Please note that the added marketing language simply rephrases the marketing language present in the latest EPA stamped accepted label dated 6/23/2008.
4. Re-categorization of certain approved (non-boiler plate) language as alternate language.

Please note that all additions / revisions involve no changes to the ingredients statement, signal word, use classification, precautionary statements, first aid, physical/chemical properties, or storage and disposal language. Furthermore, the additions do not substitute for or conflict with label text, and are not false or misleading.

Enclosed please find the following documents in support of this submission:

1. Application for Pesticide Notification (OPP ID No. 265394), which includes a signed statement certifying compliance with PR Notice 98-10;
2. One (1) copy of the proposed Master Label, with changes highlighted;
3. One (1) clean copy of the proposed Master Label; and,
4. Two (2) copies of the proposed final printed label.

Thank you for your assistance with this Notification. If you have any questions, please call me at 202-393-3903 x.17 or e-mail me at alkoster@lewisharrison.com.

Underlined text is new

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

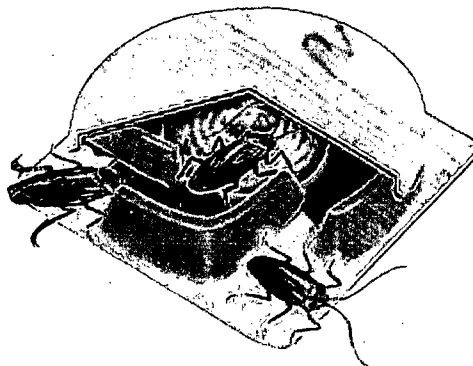
Master Label, JULY, 2008
EPA Reg. No. 64240-47
Combat Streamlined Roach Bait
Pg 1 of 9

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COMBAT[®] Small Roach Deco Bait

Alternate Brand Names:

Combat Discreet Roach Baits -or- Combat Discreet Kill Roach Baits



[For Small Roaches]

[Overnight [Action] Formula]

[Kills Overnight & Keeps on Killing for up to 6 Months]

[ROACH]

ACTIVE INGREDIENTS: Fipronil†0.03%

OTHER INGREDIENTS:99.97%

† CAS No. 120068-37-3

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. 64240-47

EPA Est. No. _____

Distributed by & ©2008 Combat Insect Control Systems

[15101 N. Scottsdale Rd.,] Scottsdale, [AZ] [ARIZONA] [85254]

[MADE IN U.S.A.]

[Contains] [2] [4] [6] [8] [12] [18] [24] [30] Bait[s] [Stations] [For Small Roaches] [each containing 0.035 oz. (1.0g) [0.05 oz (1.4g)]]

[TOTAL] NET WT.[:] [0.07 oz. (2g)] [0.1 oz (2.8g)] [0.14 oz. (4g)] [0.2 oz. (5.6g)] [0.21 oz. (6g)] [0.28 oz. (8g)] [0.3 oz (8.4g)] [0.4 oz. (11.2g)] [0.42 oz. (12g)] [0.6 oz. (16.8g)] [0.63 oz. (18g)] [0.85 oz. (24g)] [0.9 oz. (25.2g)] [1.06 oz (30g)] [1.2 oz. (33.6g)] [1.5 oz. (42g)]

[U.S. Patent Nos. _____ and others pending.]

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[Bracketed information is optional text]

~~Strikethroughs indicate deleted text~~

Master Label, JULY, 2008
EPA Reg. No. 64240-47
Combat Streamlined Roach Bait
Pg 2 of 9

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals:

CAUTION: Wash ~~[hands]~~ thoroughly with soap and water after handling bait stations.

~~**Hazards to Humans and Domestic Animals:**~~ Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Pets may be attracted to the smell of the bait. Place baits in areas inaccessible to pets.

First Aid:

If on skin:

- 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.

If in eyes:

- Hold eye open and rinse slowly and gently for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- 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. You may also contact 1-800-426-6228 for emergency medical treatment information.

STORAGE AND DISPOSAL: [Do not contaminate water, food or feed by storage or 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 partly filled:** Call your local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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[Bracketed information is optional text]

~~Strikethroughs~~ indicate deleted text

Master Label, JULY, 2008
EPA Reg. No. 64240-47
Combat Streamlined Roach Bait
Pg 3 of 9


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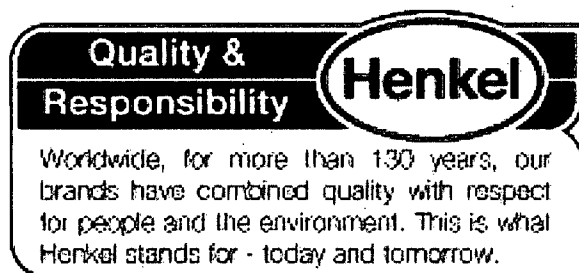
For front or back or side panel:

[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] [P]aperboard in this [C]arton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]



-or-



{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.}

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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.

[GENERAL INFORMATION]

[THIS IS] [HOW] [THIS] [Combat®] [Small Roach Deco Bait] [Combat Discreet Roach Baits]
[Combat Discreet Kill Roach Baits] [PRODUCT] WORKS:

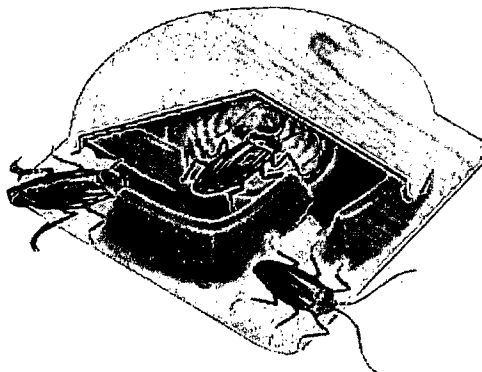
1. Roaches enter the bait station and eat the bait.
2. Roaches return to their nest and die.
3. Other roaches eat them and die, creating a chain reaction.

-or-

1. Roaches enter the bait station and eat **-or-** feed on the bait.
2. Roaches take the bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.



and/or



DIRECTIONS FOR USE, continued

MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches in the following places*.] [Here are the areas where roaches are commonly found.] [Use all bait stations at one time.] [Replace bait stations every 3 ~~-or-~~ 6 months].

| <u>*Kitchen:</u> | | |
|--------------------|-------------------------|---------------------|
| Under/around sink | On counters | Near doors |
| Under refrigerator | In cupboards/drawers | On floor/in corners |
| Under stove | Near garbage cans | |
| <u>*Bathroom:</u> | | |
| Behind toilet | Near shower/bathtub | On floor/in corners |
| Under/around sink | Inside cabinets/drawers | |

~~-or-~~

The kitchen, bathroom and points of entry (garage, basement, attic, doors, windows) are the most important locations.

~~-or-~~

The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found in the following places: (laundry room, garage, bedrooms, attic, living room).

[This product is specifically designed for small roaches.]

[Habits:] [Primarily live and breed in moist areas like kitchens and bathrooms.] [For effective control, bait stations should be placed wherever roaches have been seen in your home.*]

DIRECTIONS FOR USE, continued

[Note to Reviewer: This statement will appear on the outside container label when Step #1 of the Directions for Use (below) omits the language "Do not remove or puncture the label on bait stations":]

[GENERAL RESTRICTIONS

Do not remove or puncture label on bait stations.]

APPLICATION INSTRUCTIONS

1. [Remove wrapper.] ~~[For best results]~~ [U]se all [2] [4] [6] [8] [12] [18] [24] [30] baits [at one time]. Break baits apart. Do not remove or puncture [the] label[s] on [the] bait station[s]. [Now the baits are ready to use.]
- 2.[1.] Place baits wherever you see or have seen roaches in the following places: [*see list] ~~-or-~~ signs of roaches in the following places: [*see list] ~~-or-~~ where roaches are found in the following places: [*see list]. Then place additional baits about 1 ½ feet away. [Put any remaining baits as] ~~-or-~~ [Some of the most likely locations] ~~-or-~~ [Roach hiding places] [Hiding places for roaches] are shown in the diagram[s] to the right ~~-or-~~ left ~~-or-~~ above ~~-or-~~ below. ~~[TIP:] For best results, place baits about 1 ½ feet away from each other.]~~
3. Put out all baits. If you have fewer than [2] [4] [6] [8] [12] [18] [24] [30] places where you have seen roaches, place the extra baits about 1 ½ feet away from the other baits that you have just placed. Roaches find the bait faster when all bait stations ~~-or-~~ baits are placed out.
- 4.[2.] Place baits properly so that they are touching walls or corners. ~~[TIP:] Place properly. Bait stations~~ ~~-or-~~ Baits work best ~~[when]~~ on horizontal surfaces ~~[and]~~ ~~[when]~~ touching walls or corners.
- 5.[3.] Replace all [2] [4] [6] [8] [12] [18] [24] [30] baits every [3] [6] months, or sooner if roaches 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.]

~~[TIP:]~~ [Do not use sprays or foggers around bait stations.] [They can contaminate bait stations and reduce effectiveness.] [Use enclosed stickers for vertical surfaces.]



Claims for front or back

Performance claims:

- Kills [for] up to 1-6 months
- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- Kills roaches where they hide **-or-** breed **-or-** live **-or-** at the source
- Non-stop roach control for up to 6 months
- Satisfaction **-or-** Quality Guaranteed
- Kills roaches you see and [even] those you don't
- Protects **-or-** Defends your home against roaches
- Guaranteed to work or your money back
- Continuous roach control for up to 1-6 months
- Kills non-stop for up to 1-6 months
- Kills roaches and keeps on killing for up to 1-6 months
- Provides maximum roach control for up to 1-6 months
- Works within hours and for up to 1-6 months
- Starts working **-or-** killing in hours, [doesn't stop] [keeps] working for 1-6 months
- Laboratory [and home use] tests prove Combat® provides up to 1-6 months of effective roach control
- Keeps killing for up to 1-6 months
- Better bait formula [for improved control]** ** vs. previous formula
- With foods roaches prefer
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- Easy to use – nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor

Value claims:

Value claims are only for packs with net contents greater than 4 baits, not to exceed 30:

- Bonus Pack
- 25% More [Free]*** *** vs. standard size of this [Combat] product
- 50% More [Free]*** *** vs. standard size of this [Combat] product
- [25%] [50%] More Baits*** *** vs. standard size of this [Combat] product
- [2] [4] [6] [12] Bonus Baits With Purchase
- More Baits — Better Value*** *** vs. standard size of this [Combat] product
- Value Pack — More Baits*** *** vs. standard size of this [Combat] product

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Claims for front or back (continued)

Appearance claims:

- New [design][look][!] ***[NOTE: "New" limited to six months after first release from warehouse]***
- Decorative design blends discreetly into [the] [your] [home] [decor]
- [Decorative][wood grain][design] Blends discreetly [into] [your home['s] decor] [your decor] [the surrounding area]
- A [roach] bait station you will hardly notice
- No need to worry about unsightly bait stations
- Roach baits [with [decorative] design] [that] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Roach baits [with] [discreet] [decorative] design [that] [to] blend[s] [discreetly] [with] [into] your [home] [decor] [the surrounding area]
- Decorative design [roach bait] [baits] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Discreet [decorative] design [to] blend[s] [with] [into] [for] [the] [your] [home] [decor]
- Decorative [Decorator] design [so it] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Designed to blend discreetly [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Decorator [Decorative] design [roach baits] [to kill roaches discreetly]
- Discreet [design] [roach baits]
- For discreet roach control
- Designed to kill roaches discreetly
- Kills roaches discreetly
- Decorator [Decorative] design for discreet placement
- Decorator [Decorative] design for discreet roach control

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[Bracketed information is optional text]

~~Strikethroughs indicate deleted text~~

Master Label, JULY, 2008
EPA Reg. No. 64240-47
Combat Streamlined Roach Bait
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UNIT LABEL

COMBAT[®] Small Roach Deco Bait

Alternate Brand Names:

Combat Discreet Roach Baits -or- Combat Discreet Kill Roach Baits

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENTS: Fipronil†.....0.03%

OTHER INGREDIENTS:.....99.97%

† CAS No. 120068-37-3

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 or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For questions, comments or information about COMBAT, call toll free 1-800-426-6228.]

[Questions or Comments? Call 1-800-426-6228.]

EPA Reg. No. 64240-47

EPA Est. No. _____

Distributed by & ©2008 Combat Insect Control Systems

[15101 N. Scottsdale Rd.,] Scottsdale, [AZ] [ARIZONA] 85254

[MADE IN U.S.A.]

SEE OUTER CARTON [BAG] [CONTAINER] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT [0.035 oz (1g)] **-or-** [0.05 oz (1.4g)]