UNITED STATED	U.S. ENVIRONMENTAL PROTECTION AGENCY	EPA Reg. Number:	Date of Issuance:		
SWIRDOWN REAL PROTECTION	Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460	64240-63	'JAN 2 3 200	)9	
	NOTICE OF PESTICIDE:	Term of Issuance: unconditional			
	<u>x</u> Registration <u>Reregistration</u> (under FIFRA, as amended)		Name of Pesticide Product: Combat QK Roach Killing Gel F45		
22 C Street, NW Su Washington, DC 200				ion	
Division prior to use of the lab	el in commerce. In any correspondence on this product always refer to t				
Division prior to use of the lab On the basis of information fur Rodenticide Act. Registration is invironment, the Administrato lame in connection with the re		reregistered under the F is product by the Agenc pesticide in accordance	ederal Insecticide, Fungicide y. In order to protect health with the Act. The acceptanc	e and and th ce of ar	
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## page 2 EPA Reg. No. 64240-63

Add to the "if partly filled" disposal instructions the following: Never place unused product down any indoor or outdoor drain.

On page 2, delete the following implied safety claims:

Quality & Responsibility

Worldwide for more than 130 years, our brands have combined quality with respect for people and the environment. This is what Henkel stands for – today and tomorrow.

Delete the brackets in the Precautionary statements and the Storage and Disposal statements.

The second paragraph on page 3 contains language that makes compliance with directions for use optional, and it contains an undefined term "structures" which may lead to misuse. Revise this paragraph as follows:

Use Combat ® [QK Roach Killing Gel F45] [Alternate Brand Name] as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes) control of cockroaches in residential areas.

Revise the fourth sentence of the third paragraph on page 3 to make it clearly mandatory, and to prevent misuse:

Make gel placements at the following areas where roaches have been seen: corners, crack and crevices.

Add the chart from the cited product.

Move the following statement from the Hazards to humans and domestic animals statements to a subsection of the directions for use entitled "Use Restrictions" Keep gel away from foods and food contact surfaces.

Move statements about food and food contact surfaces into the "Use Restrictions" and revise as follows:

Do not apply gel to surfaces where food or feed is handled or prepared. Do not contaminate food, feed, drinking water or food utensils with gel.

Revise the second sentence of #2 on page 3 as follows: Place gel in cracks crevices, corners and spots where roaches have been seen.

On page 3, it is unclear what the guarantee statements mean, if they are bracketed. Delete the brackets from the guarantee statements or delete all guarantee claims from the label.

In addition to the comments on marketing claims listed above, also revise the marketing claims as provided in Attachment A.

# page 3 EPA Reg. No. 64240-63

Submit two copies of the revised final printed label for the record.

This product is exempt from child resistant packaging requirements because it is marketed as one syringe weighing 0.42 oz., 1.05 oz. or 2.1 oz. Changes in package net contents may trigger CRP, and must be submitted as an amendment, not as a notification.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

The basic and alternate confidential statements of formula (CSFs) dated 10/31/08 are acceptable.

# Summary of Comments on Scanned Document

4/23

# Page: 1

Sequence number: 1				
Author: asibold			÷	
Subject: Cross-Out				
Date: 1/23/2009 11:46:51 AM				
Delete the following claims which are not on the label of the cited product:				
For cracks and crevices where roaches hide.				
		•		
[Fast acting gel that] starts killing roaches on contact and their nests within hour	i <b>S.</b> .			
[Fast acting gel that] starts killing roaches and their nests within hours.				
[Gel] contains Fipronil, one of the fastest and most effective active ingredients a	ivailable.			
Roaches eat the gel, return to the nest, share the gel [insecticide] with others, a	ind			
eradicate the nest.	· · ·			
For large and small roaches				
For all roaches				
Sequence number: 2				
Author: asibold				
Subject: Cross-Out				
Date: 1/23/2009 11:47:39 AM			•	
Delete the following claim, which detracts from the directions for use and precat	utionary statemer	its:		
Easy to use				•
Sequence number: 3		· ·		
Author: asibold				
Subject: Cross-Out				
Date: 1/23/2009 11:48:48 AM		· · · ·		
Delete the following claim as pets can smell the bait:			•	
No vapors or fumes				
Sequence number: 4				
Author: asibold				
	,			
Subject: Cross-Out Date: 1/23/2009 2:20:35 PM			••	
Delete the following claims which are not on the label of the cited product:			t i	
For] long-term roach elimination				
[24 Hour] [Non-Stop] [Round the Clock] Roach Control	۰.			
[24 Hour] [Non-Stop] [Round the Clock] Roach Kill				
Sequence number: 5				
Author: asibold				
Subject: Cross-Out			`	
Date: 1/23/2009 11:50:12 AM				
Delete the following heightened efficacy claim:				
Ideal				
lueal				
		·····	<del> </del>	
Sequence number: 6				
Author: asibold				
Subject: Cross-Out				
Date: 1/23/2009 11:51:07 AM				
Delete the following claims, which are not on the label of the cited product:				
Kills in 12 Hours				

Comments from page 1 continued on next page

Kills in 24 Hours Kills in 1 Day Kills Overnight 5/23

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EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 4 of 9 Master Label October 31, 2008

- Ubr cracks and crevices where roaches hide.
- [Fast acting gel that] starts killing roaches on contact and their nests within hours.
- [Fast acting gcl-that] starts killing roaches and their nests within hours.
- [Gel] contains Fipronil, one of the fastest and most effective active ingredients available.
- Roaches eat the gel, return to the nest, share the gel [insecticide] with others, and eradicate the nest.
- For large and small roaches
- For all roaches
- <sup>2</sup>hsy to use
- <sup>3</sup><del>o vapors or fumes</del>
- For hard-to-reach places such as cracks and crevices
- Fast control of even large roaches
- [4] or] long-term roach elimination
- [24 Hour] [Non-Stop] [Round the Clock] Roach Control
- [24 Hour] [Non-Stop] [Round the Clock] Roach Kill
- Long residual action
- **5** Jeal for use with COMBAT® bait stations
- Guaranteed to work or your money back
- 6 ills in 12 Hours
- Kills in 24 Hours
- Kills in 1 Day
- Kills Overnight
- Starts working in hours

# Page: 2

Sequence number: 1 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:53:50 AM Delete the following claims which are not on the label of the cited product: Kills [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name Sequence number: 2 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:54:15 AM Delete the following claims which are not on the label of the cited product: for Combat Roach Gel, EPA Reg. No. 64240-35' Kills [roaches] 60% faster\* \*vs Combat Roach Killing Gel 1 {An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35) Eliminates [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1 {An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35) Kills 1 Ox faster\* \*vs Combat Roach Killing Gel 1 {An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35) Starts killing 1 Ox faster\* \*vs Combat Roach Killing Gel 1 {An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35) Controls roaches 4x faster\* \*vs Combat Roach Killing Gel 1 {An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35' Kills roaches that cause allergy and asthma attacks Sequence number: 3 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:54:52 AM Delete the following comparative claim: specific Sequence number: 4 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:56:11 AM \_\_\_Delete the following claims, which are not on the label of the cited product: Advanced Gel Formula Advanced Gel Technology Contains [both] food and water [that roaches crave] [that roaches need] Long lasting defense from roaches Long lasting roach defense Keeps killing for up to 3 months Kills non-stop for up to 3 months Kills roaches and keeps on killing for up to 3 months Provides maximum roach control for up to 3 months Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months Laboratory [and home use] tests prove Combat provides up to 3 months of effective roach control ·

7/23

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 5 of 9 Master Label October 31, 2008

## Claims for front or back

- [1]ills [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name 2br Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills [roaches] 60% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Eliminates [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills 10x faster\* \*vs Combat Roach Killing Gel 1/An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Starts killing 10x faster\* \*vs Combat Roach Killing Gel 1/An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Controls roaches 4x faster\* \*vs Combat Roach Killing Gel 1/An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills roaches that cause allergy and asthma attacks
- COMBAT® [Alternate Brand Name] [QK Roach Killing Gel F45] kills roaches fast.
- Roaches eat the gel and die in the nest.
- COMBAT® [Alternate Brand Name] [QK Roach Killing Gel F45] has a Becific

combination of roach food attractants and a fast-acting active ingredient to create a highly effective tool in the fight against roaches.

• The gel attracts roaches in search of food and water to the bait.

- Roaches ingest the bait and return to die in their nest.
- Advanced [food] formula\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- <sup>4</sup>dvanced Gel Formula
- Advanced Gel Technology
- Contains [both] food and water [that roaches crave] [that roaches need]
- Long lasting defense from roaches
- Long lasting roach defense
- Keeps killing for up to 3 months
- Kills non-stop for up to 3 months
- Kills roaches and keeps on killing for up to 3 months
- Provides maximum roach control for up to 3 months
- Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months
- Laboratory [and home use] tests prove Combat provides up to 3 months of effective roach control

# Page: 3

Sequence number: 1 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:59:01 AM Delete the following claims which are not on the label of the cited product: Effective [!] a Effective roach control Easy to use - nothing to activate For nooks and crannies For cracks and crevices EPA Reg. No. 64240--Combat QK Roach Killing Gel F45, Page 6 of 9 Master Label October 31,2008 Take control [!] Take control of your ant problem Sequence number: 2 Author: asibold Subject: Cross-Out Date: 1/23/2009 11:57:35 AM Delete the following claims which are not on the label of the cited product: Kills roaches quickly Kills [roaches] in hours Quick kill formula Quick killing action Quick defense Quick defense from roaches Instant roach defense Instant defense from roaches Kills roaches where they hide Kills roaches where they breed a Kills roaches where they live a Kills roaches you see and [even] those you don't Protects your home against roaches Protects your home Roach defense Protection for your home against roaches Protect your home against roaches Defend your home against roaches Defends your home against roaches Defense for your home against roaches Defend[s] your home from roaches Sequence number: 3 Author: asibold

Author: asibold Subject: Cross-Out Date: 1/23/2009 11:58:13 AM Delete the following enhanced efficacy and safety claim: Quality

Combat QK Roach Killing Gel F45, Page 6 of 9 Mastor Label October 31, 2008

- **Dills roaches quickly**
- Kills [roaches] in hours
- Quick kill formula
- Quick killing action
- Quick defense
- Quick defense from roaches
- Instant roach defense
- Instant defense from roaches
- Kills roaches where they hide
- Kills roaches where they breed
- Kills roaches where they live
- Kills roaches you see and [even] those you don't
- Protects your home against roaches
- Protects your home
- Roach defense
- Protection for your home against roaches
- Protect your home against roaches
- Defend your home against roaches
- Defends your home against roaches
- Defense for your home against roaches
- Defend[s] your home from roaches
- Guaranteed to work [or your money back]
- Satisfaction Guaranteed
- Buality-Guaranteed
- Effective [!]
- Effective roach control
- Easy to use nothing to activate
- For nooks and crannies
- For cracks and crevices
- Take control [!]
- Take control of your ant problem

# Page: 4

Sequence number: 1 Author: asibold Subject: Cross-Out Date: 1/23/2009 12:00:19 PM Delete the following claims which are not on the label of the cited product: Stay protected Stay protected from roaches The hard line on roaches Combat - the hard line on roaches Take the hard line on roaches Take the hard line on roaches with Combat With [a blend ofl [multiple] foods roaches eat With multiple foods to kill roaches [and the nest] Targeted Targeted roach control Targets roaches Targets roaches where they live Targets the nest Targets the colony Precise [!! Precise killing action Precise roach killing action Precise roach control Precision control Precision roach control Precise roach control targets roaches Precise roach control targets roaches where they live Advancing pest control Advancing roach control Advancing roach control with targeted killing action Advancing roach control with precise killing action Advancing roach control with Combat

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 7 of 9 Master Label October 31, 2008

- Ulay protected
- Stay protected from roaches
- The hard line on roaches
- Combat the hard line on roaches
- Take the hard line on roaches
- Take the hard line on roaches with Combat
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- Targeted
- Targeted roach control
- Targets roaches
- Targets roaches where they live
- Targets the nest
- Targets the colony
- Precise [+]
- Precise killing action
- Precise roach killing action
- Precise roach control
- Precision control
- Precision roach control
- Precise roach control-targets roaches
- Precise roach control targets roaches where they live
- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

# Page: 5

Sequence number: 1 Author: asibold Subject: Cross-Out Date: 1/23/2009 12:00:53 PM Delete the following claims which are not on the label of the cited product: Specially formulated Specially formulated for roach control Specially formulated for long term control Specially formulated for long term roach control No bad odor No objectionable odor No mess and no bad odor No mess and no objectionable odor No mess or bad odor No mess or objectionable odor For best results[,] use Combat [brand] roach baits and gels For best results[,] use Combat [brand] roach baits and gels and sprays For best roach control[,] use Combat [brand] baits and gels For best roach control[.] use Combat [brand] baits and gels and sprays For best roach control results[,] use Combat [brand] baits and gels For best roach control results[,] use Combat [brand] baits and gels and sprays For best results[,] use Combat [brand] products as part of a complete roach control system For best results[,] use Combat [brand] products for [your] roach control needs Professional strength Professional performance Professional roach control strength Professional roach control performance

EPA Reg. No. 64240-\_\_\_ Combat QK Roach Killing Gel F45, Page 8 of 9 Master Label October 31, 2008

#### Claims for front or back

- Upecially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control
- No-bad odor
- No objectionable odor
- No mess and no bad odor
- No mess and no objectionable odor
- No mess or bad odor
- No mess or objectionable odor
- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays.
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs
- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance.

Please recycle empty carton.

Guaranteed to Work or your money back!

Call the Combat® helpline at 1-800-426-6228 for information.

> EPA Reg. No. 64240-\_\_\_ Combat QK Roach Killing Gel F45, Page 1 of 9 Master Label October 31, 2008

# COMBAT<sup>®</sup> QK Roach Killing Gel F45 [Alternate Brand Names to be Determined]

Approximate position of approved marketing claims & bursts

# USE ONLY IN AREAS INACESSABLE TO CHILDREN AND PETS KEEP OUT OF REACH OF CHILDREN CAUTION:

See side and back panel for additional precautionary statements and directions

ACTIVE INGREDIENT: Fipronil\*.....0.01% OTHER INGREDIENTS:.....99.99% \*CAS No. 120068-37-3

> Contains: 1 Syringe TOTAL NET WT 0.42 OZ (12g) -or- 1.05 OZ (30g) -or- 2.1 OZ (60g)

EPA Reg. No: 64240-\_\_\_ EPA Est. No.

DISTRIBUTED BY ©2008 [2009]COMBAT INSECT CONTROL SYSTEMS, SCOTTSDALE, ARIZONA 85254. MADE IN USA.

ACCEPTED with COMMENTS In EPA Letter Dated:

# JAN 2 3 2009

Undor the Federal Insecticide, Bragicide, and Rodensbuild Act, as anonded, for the persiet registered under EPA Roy. No.

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 2 of 9 Master Label October 31, 2008

Product may stain textiles and clothing.

# PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

**CAUTION:** Keep gel away from foods and food contact surfaces. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

**FIRST AID:** IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice. IF IN EYES: Hold eye open, rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 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. **PHYSICAL OR CHEMICAL HAZARDS:** Do not use this product in or on electrical

equipment due to the possibility of a shock hazard.

**STORAGE AND DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store in a cool, dry area out of reach of children.

## **DISPOSAL:**

If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency [or 1-800-CLEANUP].

If you have questions regarding the use of this product, please call the Combat® helpline at 1-800-426-6228 for information.

For front or back or side panel:



<u>{Note to Reviewer</u>: 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.}

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 3 of 9 Master Label October 31, 2008

# **DIRECTIONS FOR USE:**

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not use for control of insects other than those listed on this label.

COMBAT® [QK Roach Killing Gel F45] [*Alternate Brand Name*] may be used as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas.]

## **GENERAL DIRECTIONS:**

Application rate is dependent on level of infestation and species to be controlled. Gel can be applied only as spots or as a bead [-or- in a line -or- in a strip] in cracks and crevices. The lower application rate should be used for low to moderate infestations or re-treatments, and the higher rate for more severe infestations or where the population occurs in inaccessible areas, such as in walls. Gel placements should be made at or near areas of roach traffic and suspected nesting areas, such as corners, cracks and crevices. Numerous smaller placements will provide faster control than fewer larger spots, especially for German cockroach control.

Do not apply gel to areas that have recently been sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent. Do not apply gel to surfaces where food is handled or prepared. Do not contaminate food or utensils with gel.

#### FOR INDOOR USE:

- 1. To apply gel: Remove cap from tip, touch tip to surface and depress plunger. Gel can be applied only as spots or in a bead [-or- line -or- strip] along cracks or crevices. For first application, apply gel in 4 dime-sized spots or several 1<sup>1</sup>/<sub>2</sub> to 6-inch beads [-or- lines -or- strips] per square yard. Recap tube after use.
- 2. Place many spots or dabs of gel near areas of roach traffic and suspected nesting areas. Gel can be placed in cracks, crevices, corners and spots where roaches occur.
- 3. Inspect gel after one month and reapply if no longer visible. Refresh with a new application after 3 months. Gel cleans up with a damp paper towel. Discard towel after use.

FOR OUTDOOR USE (adjacent to home or structure): Place gel in areas adjacent to structures where roaches may nest or breed. Apply gel to places where roaches may enter your home, such as eaves, sills and expansion joints. Apply gel in protected areas whenever possible, as direct sunlight and water will reduce the residual effectiveness. Inspect gel after one month and reapply if no longer visible. Refresh with a new application after 3 months.

EPA Reg. No. 64240-\_\_\_ Combat QK Roach Killing Gel F45, Page 4 of 9 Master Label October 31, 2008

- For cracks and crevices where roaches hide.
- [Fast acting gel that] starts killing roaches on contact and their nests within hours.
- [Fast acting gel that] starts killing roaches and their nests within hours.
- [Gel] contains Fipronil, one of the fastest and most effective active ingredients available.
- Roaches eat the gel, return to the nest, share the gel [insecticide] with others, and eradicate the nest.
- For large and small roaches
- For all roaches
- Easy to use
- No vapors or fumes
- For hard-to-reach places such as cracks and crevices
- Fast control of even large roaches
- [For] long-term roach elimination
- [24 Hour] [Non-Stop] [Round the Clock] Roach Control
- [24 Hour] [Non-Stop] [Round the Clock] Roach Kill
- Long residual action
- Ideal for use with COMBAT® bait stations
- Guaranteed to work or your money back
- Kills in 12 Hours
- Kills in 24 Hours
- Kills in 1 Day
- Kills Overnight
- Starts working in hours

> EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gei F45, Page 5 of 9 Master Label October 31, 2008

# Claims for front or back

- Kills [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills [roaches] 60% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Eliminates [roaches] 50% faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills 10x faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Starts killing 10x faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Controls roaches 4x faster\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Kills roaches that cause allergy and asthma attacks
- COMBAT® [Alternate Brand Name] [QK Roach Killing Gel F45] kills roaches fast.
- Roaches eat the gel and die in the nest.
- COMBAT® [*Alternate Brand Name*] [QK Roach Killing Gel F45] has a specific combination of roach food attractants and a fast-acting active ingredient to create a highly

effective tool in the fight against roaches.

- The gel attracts roaches in search of food and water to the bait.
- Roaches ingest the bait and return to die in their nest.
- Advanced [food] formula\* \*vs Combat Roach Killing Gel 1{An alternate brand name for Combat Roach Gel, EPA Reg. No. 64240-35}
- Advanced Gel Formula
- Advanced Gel Technology
- Contains [both] food and water [that roaches crave] [that roaches need]
- Long lasting defense from roaches
- Long lasting roach defense
- Keeps killing for up to 3 months
- Kills non-stop for up to 3 months
- Kills roaches and keeps on killing for up to 3 months
- Provides maximum roach control for up to 3 months
- Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months
- Laboratory [and home use] tests prove Combat provides up to 3 months of effective roach control

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 6 of 9 Master Label October 31, 2008

- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- Quick killing action
- Quick defense
- Quick defense from roaches
- Instant roach defense
- Instant defense from roaches
- Kills roaches where they hide
- Kills roaches where they breed
- Kills roaches where they live
- Kills roaches you see and [even] those you don't
- Protects your home against roaches
- Protects your home
- Roach defense
- Protection for your home against roaches
- Protect your home against roaches
- Defend your home against roaches
- Defends your home against roaches
- Defense for your home against roaches
- Defend[s] your home from roaches
- Guaranteed to work [or your money back]
- Satisfaction Guaranteed
- Quality Guaranteed
- Effective [!]
- Effective roach control
- Easy to use nothing to activate
- For nooks and crannies
- For cracks and crevices
- Take control [!]
- Take control of your ant problem

EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 7 of 9 Master Label October 31, 2008

- Stay protected
- Stay protected from roaches
- The hard line on roaches
- Combat the hard line on roaches
- Take the hard line on roaches
- Take the hard line on roaches with Combat
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- Targeted
- Targeted roach control
- Targets roaches
- Targets roaches where they live
- Targets the nest
- Targets the colony
- Precise [!]
- Precise killing action
- Precise roach killing action
- Precise roach control
- Precision control
- Precision roach control
- Precise roach control targets roaches
- Precise roach control targets roaches where they live
- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

> EPA Reg. No. 64240-\_\_\_ Combat QK Roach Killing Gel F45, Page 8 of 9 Master Label October 31, 2008

# Claims for front or back

- Specially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control
- No bad o'dor
- No objectionable odor
- No mess and no bad odor
- No mess and no objectionable odor
- No mess or bad odor
- No mess or objectionable odor
- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs
- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance

Please recycle empty carton.

Guaranteed to Work or your money back!

Call the Combat® helpline at 1-800-426-6228 for information.

> EPA Reg. No. 64240-\_\_ Combat QK Roach Killing Gel F45, Page 9 of 9 Master Label October 31, 2008

## Syringe Label for:

# COMBAT<sup>®</sup> QK Roach Killing Gel F45 [Alternate Brand Names to be Determined]

Syringe sizes: [0.42 OZ (12 g)] -or- [1.05 OZ (30 g)] -or- [2.1 OZ (60 g)]

(This syringe label is approximately 100% of the size for the 30g syringe. Actual size will be adjusted to fit each of the 3 different sizes of syringe..)

NOTE: DO NOT REMOVE THIS LABEL.

SEE CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

LEER LAS INSTRUCCIONES Y PRECAUCIONES EN EL CARTON.

KEEP OUT OF REACH OF CHILDREN AND PETS

Use only in areas inaccessible to children and pets

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS. MROACHENGA EL PRODUCTO ALEJADO DEL ALCANCE DE LOS NIÑOS. USAR SOLO EN AREAS INACCESIBLES A NIÑOS Y MASCOTAS. PRECAUCIONES: RIESGOSO PARA PERSONAS Y ANIMALES DOMÉSTICOS.

CAUTION: Keep gel away from foods and food contact surfaces. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with scap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID: IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of scap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice. IF IN EYES: Hold eye open, rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 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.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. STORAGE: Store in a cool, dry area out of reach of children. DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency.

#### COMBAT® QK ROACH KILLING GEL F45

[Alternate Brand Name]

Product may stain textiles and clothing.

Questions or Comments call 1-800-426-6228.

DIST. BY ©2008 COMBAT INSECT CONTROL SYSTEMS SCOTTSDALE, ARIZONA 85254 MADE IN USA.

...99.99%

EPA Reg. No. 64240-\_\_\_, EPA Est. No. \_\_\_\_

ACTIVE INGREDIENT: Fipronil\*......0.01%

OTHER INGREDIENTS:.....

\*CAS NO. 120068-37-3

NET WT [0.42 OZ (12 g)] -or- [1.05 OZ (30 g)] -or- [2.1 OZ (60 g)]