

64240-67

7/25/2011

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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

JUL 25 2011

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 July 12, 2011 for the following product(s):

Combat Roach Killing Bait Strips

Alternate Brand Name

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.

Combat® Flik R

EPA Reg. No. 64240-67

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".

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

2015



EPA

United States Environmental Protection Agency Washington, DC 20460

- Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 64240-67
2. EPA Product Manager: Richard Gebken
3. Proposed Classification: None/Restricted
4. Company/Product (Name): Combat Flick R
5. Name and Address of Applicant: c/o Henkel Consumer Goods Inc.
6. Expedited Review: NOTIFICATION JUL 25 2011

Section - II

Amendment - Explain below. Resubmission in response to Agency letter dated 5/5/211. Notification - Explain below. Final printed labels in response to Agency letter dated. "Me Too" Application. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

NOTIFICATION OF ALTERNATE BRAND NAME: Combat Roach Killing Bait Strips 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.

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, Type of Container. 3. Location of Net Contents Information. 4. Size(s) Retail Container. 5. Location of Label Directions. 6. Manner in Which Label is Affixed to Product.

Section - IV

1. Contact Point: Georgia Anastasiou - Lewis & Harrison, LLC, Agent for Combat Insect Control Systems. Certification: I certify that the statements I have made on this form... 2. Signature: Georgia Anastasiou. 3. Title: Agent for Combat Insect Control System. 4. Typed Name: Georgia Anastasiou - Lewis & Harrison, LLC. 5. Date: July 12, 2011. 6. Date Application Received (Stamped)

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 12, 2011

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® Flik R (EPA Reg. No. 64240-67)
Notification per PR Notice 98-10: Alternate Brand Name**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems (“Combat”), I responding to the alternate brand name notification rejection letter dated May 5, 2011 (attached). As requested in the letter, we have revised the graphics for the final printed label to show the suggested placement for the bait strips in areas that will not contact food or food surfaces and that are inaccessible to children. Please note the placement of the bait strips are strictly in areas where homeowners would find roaches.

Combat is re-proposing the following alternate brand name for the product Combat® Flik R (EPA Reg. No. 64240-67):

Combat Roach Killing Bait Strips

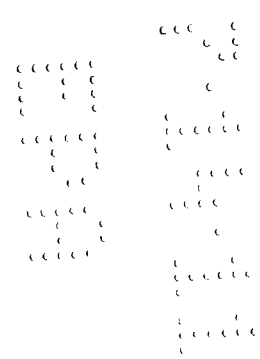
We hope that you find the enclosed label acceptable and can approve the alternate brand name. If you have any questions about this submission, please call me at 202-393-3903 ext. 19 or e-mail me at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard, Combat Insect Control Systems



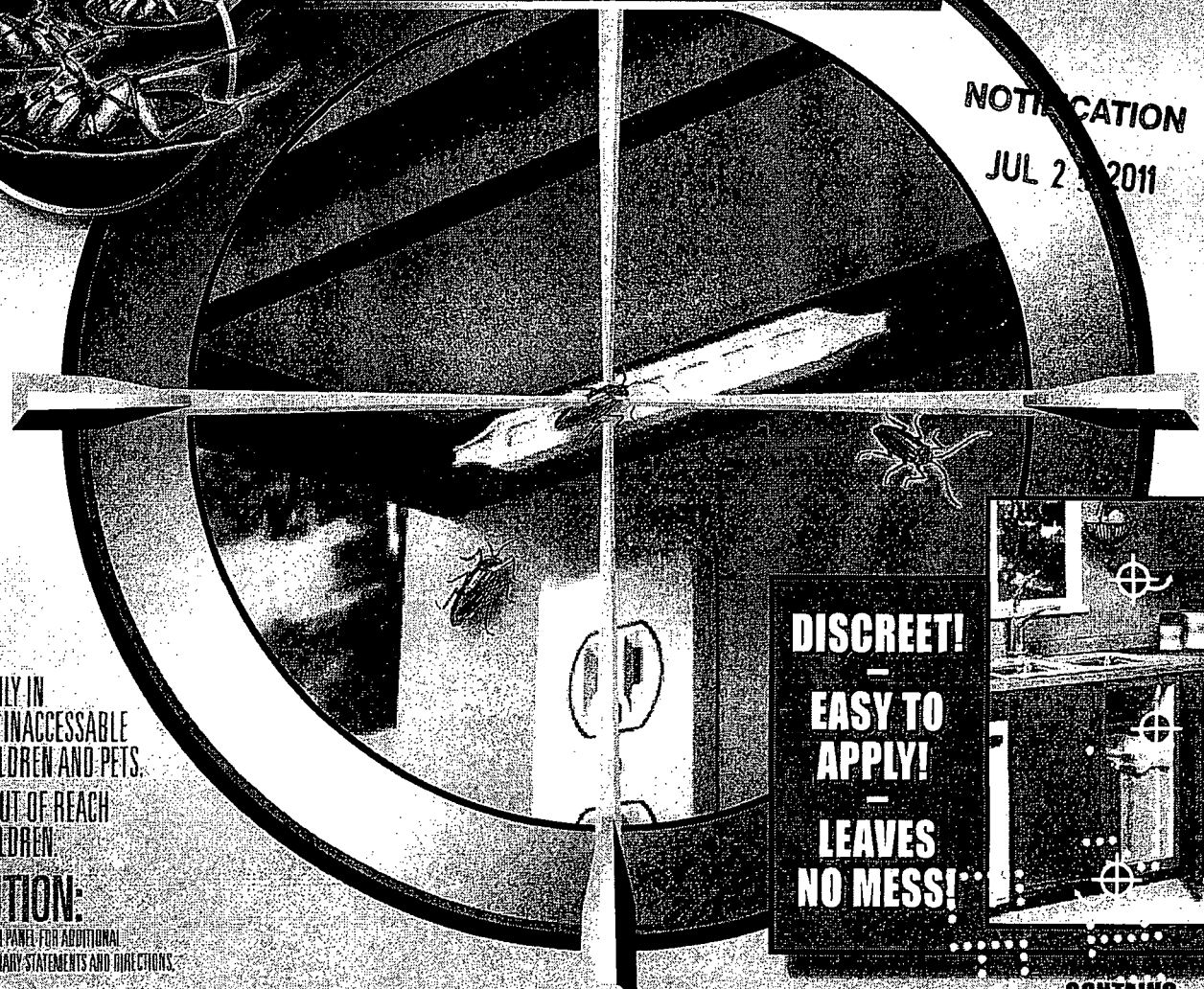
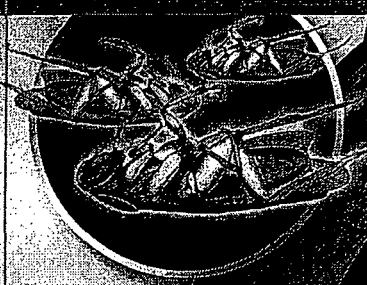
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COMBAT

**DESTROYS
THE NEST!**

ROACH KILLING BAIT STRIPS

**SMALL & LARGE
ROACHES**



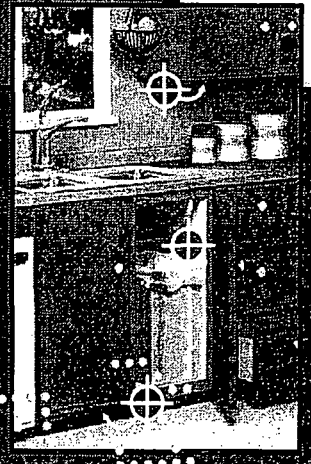
NOTIFICATION
JUL 2 2011

USE ONLY IN
AREAS INACCESSIBLE
TO CHILDREN AND PETS.
KEEP OUT OF REACH
OF CHILDREN.

CAUTION:
SEE BOTTOM PANEL FOR ADDITIONAL
PRECAUTIONARY STATEMENTS AND DIRECTIONS.

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

DISCREET!
—
**EASY TO
APPLY!**
—
**LEAVES
NO MESS!**



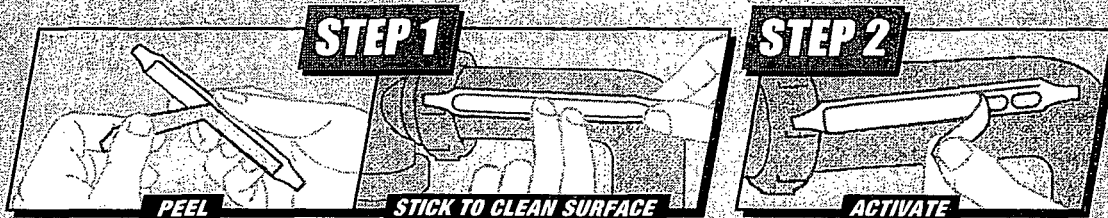
TOTAL NET WT 0.71 OZ (20.0g)

**CONTAINS:
10 BAIT
STRIPS**

50A5

COMBAT ROACH KILLING BAIT STRIPS

- Thin, clear, adhesive strips.
- Goes where bait stations can't.
- The easy way to solve your roach problem.



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.

For indoor and outdoor (adjacent to the home) use:

1. To place strips indoors or outdoors (adjacent to the home), peel off protective film on the bottom of the strip marked "Step 1" and stick to a clean surface.
2. To activate a strip, peel off the protective film on top of the strip marked "Step 2".
 - Discard the removed film in the trash
 - Use all bait strips at one time.
 - Replace after 3 months.

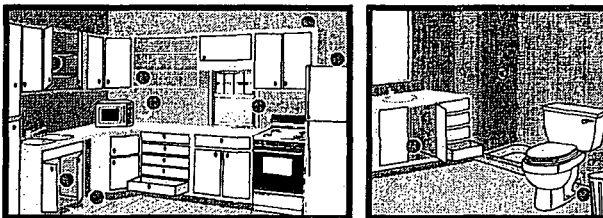
DO NOT use in beehives.

DO NOT spray insecticide on or around the bait strips, as sprays will contaminate bait strips and reduce effectiveness.

HOW THIS PRODUCT WORKS:

- Roaches eat the gel bait.
- Roaches carry the gel back to the nest where other roaches are exposed to the insecticide.
- The entire nest is destroyed.

RECOMMENDED BAIT STRIP PLACEMENT LOCATIONS



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: 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

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MADE IN KOREA
EPA Reg. No. 64240-67 EPA Est. No. 85632-KOR-001

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



PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Keep bait strips 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.

Should you have any questions regarding COMBAT®, please call 1-800-426-6228.