

64240-1

9/20/96

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SEP 20 1996

Mr. Stephen Smith
Combat Insect Control Systems
P.O. Box 493
Pleaston, CA 94566-0803

Dear Mr. Smith:

Subject: Amendment - Label
Combat Fire Ant Killer
EPA Registration No. 64240-1
Your Submission dated July 16, 1996

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

1. Delete the heading "Broadcast Treatment" and the directions beneath it. This use has not been approved for this product and would trigger exposure. Therefore, appropriate data must be submitted for approval to include this use.

2. Move the directions for individual packets under "Single Mound Treatment".

3. Under "Claims" on page 1 and also on page 2 of the label, revise
..... Kills ant mounds
and
..... Now with Combat.....can kill ant mounds
to read: "destroys ant mounds".

4. On page 2, replace the word "next" with "nest" to read:
.....The unique delayed action..... back to their nest

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

If you have any questions, please contact Sheila Moats at (703) 305-6701.

Sincerely yours,

RPK
Richard P. Keigwin, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure:

**COMBAT®
FIRE ANT KILLER**

Active Ingredient: Hydramethylnon (tetrahydro-5,5-dimethyl-2(1H)-
 pyrimidinone (3-[4-(trifluoromethyl)phenyl]-1-[2-[4-(trifluoromethyl)
 phenyl]ethenyl]-2-propenylidene)hydrazone) 1.0%
Inert Ingredients: 99.0%

claims for front or back panel

- * Guaranteed to work or [your] Money back (see back panel)
- * Kills the queen and [destroys] the [entire] colony.
- * Easy to use.
- * Unique, delayed action formula allows ant to carry bait back to the nest where the entire colony is killed.
- * Kills [fire] ant colonies within one week.
- * Granules are easily carried back to the colony.
- * Granules are tiny and blend-in with dirt and sand.
- * Light brown coloring allows bait to blend-in with dirt and sand.

- * Gets to the source of infestation.
- * Does not repel [fire] ants.
- * Kills [Fire] Ant mounds.
- * The granules attract worker [fire] ants who carry the bait back to the nest where the entire colony, including the queen, is killed.
- * Concentrated formula
- * Convenient, one-step process
- * Prevents mounds from relocating
- * Call the Combat® Labs [Information] Helpline at 1-800-426-6228 for more information.
- * Kills {50 to 100} [Fire] Ant mounds

=====

- * Granules

- * No Mixing
- * Ready-to-Use

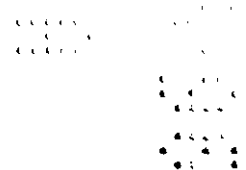
- * Limits new mound formation

ACCEPTED
with CC-1
in EPA Letter Dated

SEP 20 1996
Under the
F
a
reg. No. 64240-1

KEEP OUT OF REACH OF CHILDREN
CAUTION: See back panel for additional precautionary statements

[Contains ___ childproof packets]
Net Wt 11.2 oz (317.5 g) or _____



COMBAT® Fire Ant Killer

{secondary kill diagram with two illustrations:

1. Combat will attract foraging worker [fire] ants to the bait granules. The [fire] ants will feed on the bait.
2. Worker [fire] ants will take some of the bait back to the nest where they pass it on to kill the queen and entire colony.

-or-

{secondary kill diagram with three illustrations:

This is how COMBAT® Fire Ant Killer granules work:

1. Sprinkle granules.
2. The granules attract worker [fire] ants.
3. Worker [fire] ants carry bait back to the nest where the entire colony, including the queen is killed.

Mound illustration

This is how COMBAT® Fire Ant Killer granules work:

1. Sprinkle granules.
2. [Fire] Ants take bait -- return to nest -- Kill the Queen & Entire Colony

Now with COMBAT® Fire Ant Killer you can kill [fire] ant mounds.

COMBAT® Fire Ant Killer is a combination of food attractants and a patented insecticide ingredient that is highly effective against [fire] ants. [The insecticide is specially formulated to allow time for worker ants which find the bait to carry it back to the queen and other ants before dying. If the queen isn't killed, the mound will be quickly repopulated or relocated and require repeat treatment. This product kills the queen, so it destroys the colony.]

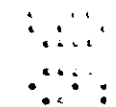
- * The granules attract worker [fire] ants who carry the bait back to the nest where the entire colony including the queen is killed.
- * This unique, delayed action bait allows worker ants, looking for food and water, enough time to bring the granules back to their nest where the queen and the colony feeds on it and dies.

FROM THE COMBAT LABS: [For questions or comments, please c] [C]all the Combat® Labs [Information] Helpline at 1-800-426-6228 [for more information].

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[Contents of this box will treat 6 or ___ average size (approximately 29 inches in diameter) [fire] ant mounds.] Wear gloves when using the product and wash hands thoroughly after handling.



Single Mound Treatment

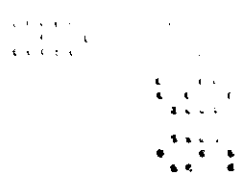
1. For localized activity of [fire] ants [hills and trails], measure or sprinkle {3 g (1 teaspoon) to 6 g (2 teaspoons)} of Combat® Fire Ant Killer granules at the base of the ant mound or along ant trail. Do not put the granules directly in or on the mound. Do not disturb the mound. This will aggravate the ants and may cause them to relocate their mound. One container is sufficient to kill {50 to 100} [fire] ant mounds. (Large mounds may require more or double this amount.)
2. After application, you may see increased ant activity around Combat® Fire Ant Killer granules. Do not spray or interfere with their feeding. The [fire] ants need time to take the granules back to the colony to kill the queen and entire colony.
3. You should expect to see a significant reduction in [fire] ants within a week.
4. If large colonies are present, a repeat treatment after one week may be necessary.
5. For best results, apply Combat® Fire Ant Killer granules when ants are most active. This generally occurs during the early morning hours or at dusk. Avoid application during the heat of the day or if rain threatens.

Broadcast Treatment:

For general control of [fire] ants outdoors around your yard, sprinkle granules lightly in the yard. One package will treat [up to] a half acre.

directions if sold in individual packets

1. The amount of this product need to treat an average size [fire] ant mound has been pre-measured into each single treatment packet. Using a pair of scissors, cut the packet along the dotted line and apply the entire contents of the packet uniformly around the base of the ant mound. Do not apply directly to the top of the mound and do not disturb the mound. (See illustration).
2. For best results, this product should be applied when ants are most active. This generally occurs during the early morning hours or at dusk. Avoid application during the heat of the day or if rain threatens.
3. Worker ants will find this product, carry it back to the mound, and pass it along to the queen and other ants before dying. Typically, the queen and a number of ants will be dead within a week and mound activity will gradually decline afterwards as no new ants are produced.
4. For particularly large ant mounds containing extreme numbers of ants, it may be necessary to apply a second packet to the mound. Refer to the illustration after treating the mound to see if you have enough product coverage.



PRECAUTIONARY STATEMENTS:

CAUTION: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT:

If swallowed, drink one or two glasses of water. Call physician of poison control center at once. Do not induce vomiting or give anything by mouth to an unconscious person.

HAZARDS TO DOMESTIC ANIMALS:

Pets may be attracted to this product. Keep pets away from treated areas for at least 24 hours after application.

ENVIRONMENTAL HAZARDS:

This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

STORAGE & DISPOSAL: **Storage:** Keep in original container. Store in cool, dry, secure place. **Disposal:** Do not rinse can. Discard in trash.

Storage and disposal for oil-based product

This product is formulated in an oil bait that functions as an attractant to ants. Prolonged exposure to air may turn oil rancid and may reduce the attractiveness of the bait. Therefore, do not store any packets -or- containers which have been opened. Do not reuse empty packets -or- containers. Wrap packet -or- container and put in trash collection.

EFFECTIVENESS GUARANTEE: If this product fails to eliminate mound activity after 4 weeks, return the empty container for a full refund to _____

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Combat Insect Control Systems
1221 Broadway, Oakland, CA 94612
MADE IN U.S.A.
EPA Reg. No. 64240-1
EPA Est. No. _____
US Patent Nos. _____

