

64240-3

8-9-2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AUG 9 2007

Mr. Robert S. Brennis
Product Registration
Combat Insect Control Systems
15101 N. Scottsdale Rd.
Scottsdale, AZ 85254

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Minor Label Change
EPA Reg. No. 64240-3
Application Dated July 19, 2007

Dear Mr. Brennis:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/19/07 for the above product. The Registration Division (RD) has conducted a preliminary screen 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 read "Linda Arrington".

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

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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
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Application for Pesticide - Section I

1. Company/Product Number 64240-3	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Ant Killing System	PM# PM 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15101 N. Scottsdale Rd. Scottsdale, AZ 85254 <u>PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW</u> <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. _____ Product Name _____

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 type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: This is a simple notification to add the word Ant under our graphic so customers know what the target pest is. We added the option of homes to households, and added a reference to the color of the label. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input checked="" 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"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Robert S. Brennis, Lewis & Harrison 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. 20
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent for Combat Insect Control Systems	
4. Typed Name Robert S. Brennis	5. Date July 19, 2007	

LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 740
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

July 19, 2007

Richard Gebken, PM Team 10
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504C)
Document Control Desk (Notif)
1801 Bell Street S.
Arlington, VA 22002

Combat Insect Control Systems
Combat® Ant Killing System, EPA Appl. No. 64240-3
Notification

Dear Mr. Gebken:

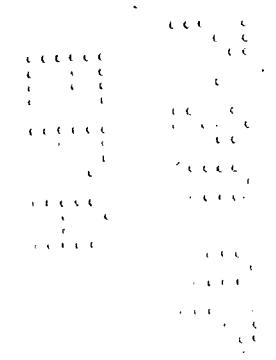
This is a simple notification to add the word Ant under our graphic so customers know what the target pest is. We added the option of homes to households, and added a reference to the color of the label. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. 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 the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions about the enclosed registration submission, please contact me either by telephone at 202-393-3903 ext. 20 or by e-mail at rbrennis@lewisharrison.com.

Sincerely,



Robert S. Brennis
Agent for Dial Corporation

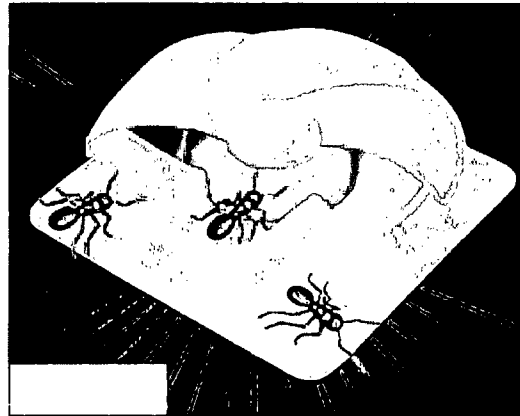


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Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]
Underlined text is new.

Master Label, July 2007
EPA Reg. No. 64240-3
Combat Ant Killing System
Pg 1 of 6

COMBAT[®] Ant Killing System



[ANT]

FOR INDOOR AND OUTDOOR USE

- KILLS THE QUEEN & ENTIRE COLONY
- ANTS CARRY BAIT BACK TO THE COLONY TO KILL THE QUEEN AND OTHER ANTS BEFORE THEY COME INSIDE YOUR HOME
- KILLS ANTS OUTDOORS BEFORE THEY COME INDOORS.

ACTIVE INGREDIENT: Hydramethylnon† 1.0%

OTHER INGREDIENTS: 99.0%

†CAS No. 67485-29-4

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION

SEE PRECAUTIONARY STATEMENT *-or-* PRECAUTIONS ON END *-or-* SIDE *-or-* BOTTOM *-or-* BACK PANEL

[COMBAT[®] GUARANTEED to work [or your money back]]

EPA Reg. No. 64240-3

EPA Est. No. 071106-GA-001

Distributed by & ©2007

Combat Insect Control Systems

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

MADE IN U.S.A.

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

TOTAL NET WT. _____

CONTAINS X NUMBER CHILD-RESISTANT [BAIT] STATIONS *-or-*

CONTAINS X NUMBER CHILD-RESISTANT [BAIT] STATIONS AND STAKES

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

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

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

DISPOSAL: If empty: Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

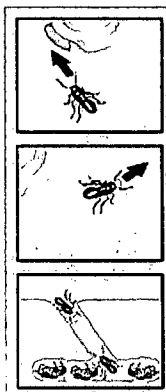
DIRECTIONS FOR USE

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

GENERAL INFORMATION

[THIS IS] [HOW] COMBAT® [ANT KILLING SYSTEM] [THIS PRODUCT] WORKS:

1. Ants enter bait station and leave after eating bait inside. **-or-**
This product will attract foraging worker ants to the bait feeding station. The ants will feed on the bait.
2. Ants carry bait back to colony and kill queen and other ants. **-or-**
Worker ants will take some of the bait back to the nest where they pass it on to kill the queen and entire colony.



DIRECTIONS FOR USE - GENERAL INFORMATION, Continued

- This product contains a totally unique insecticide ingredient which kills most ants commonly found in households ***-or- homes***. COMBAT® bait stations are effective because ants carry bait back to where they live to destroy queen and entire colony. It even kills ants you don't see outside of your home to prevent more ants from coming inside.
- This product kills the following ants which feed on sweet and greasy materials: Fire Ants, Argentine, Black, Carpenter, Cornfield, Little Black, Odorous House, and Pavement Ants.
- This product is easy to use and has no insecticide odor.

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not remove or puncture [the] [white] label on bait stations.

APPLICATION INSTRUCTIONS

1. Use all X NUMBER baits. Place baits by ant trails or close to areas where ants are numerous. Place additional baits anywhere any may gain entry indoors.
2. Do not spray insecticide on or around the bait stations.
3. Replace all X NUMBER baits after 3 months of use to keep ants from reappearing.



-or-

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DIRECTIONS FOR USE - APPLICATION INSTRUCTIONS, Continued

1. Break baits apart ***-or-*** Break COMBAT® bait stations apart from plastic frame. Do not remove or puncture label on bait stations. Use all X NUMBER bait stations at the same time for thorough control. ***-or-*** Break child-resistant bait feeding stations apart from the frame. Do not remove or puncture label on bait stations. For thorough ant control, use all X NUMBER stations at the same time.
2. [Simply] place each bait station by any trails or close to areas where ants are numerous. Inside, COMBAT® can be placed in cabinets, next to food and dishes, or anywhere your ant problem occurs. Do not spray the bait stations. ***-or-***
For general control of ants outdoors and to prevent them from coming indoors, place a bait station every 15-20 feet around the perimeter of your home. Place additional [COMBAT®] bait[s] [stations near cracks or crevices, along sills, or] anywhere ants may gain entry indoors. Do not spray insecticide on or around the bait stations.
3. Outside your home, place additional COMBAT® bait stations near cracks and crevices, along sills, or anywhere ants may gain entry. ***-or-***
Stations may be secured to the ground by pushing the stake through the hole in the corner of the station. The stake may be hammered in place if necessary. The station will be held more securely if the stake is pushed all the way in with the arm across the top of the station.
4. Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within one week. For best results, do not interfere with the ants or the bait stations during its use because ants must carry bait back to the colony to kill the queen and the other ants. ***-or-***
Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within one week. For best results, do not interfere with the ants or the bait stations during their use because ants must carry bait back to the nest to kill the queen and the entire colony.
5. [Indoor:] Replace all X NUMBER bait[s] [stations] after 3 months of use to keep ants from reappearing. ***-or-***
[Outdoor:] For continuous control of ants, replace all bait stations after 6 weeks of use.

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Claims for Front or Back:

- ODORLESS
- CHILD-RESISTANT
- EASY – TO – USE
- NO VAPOR, FUMES OR ODOR
- KILLS THE QUEEN AND THE ENTIRE COLONY
- NO INSECTICIDE ODOR
- KILLS COMMON OUTDOOR ANTS, INCLUDING FIRE ANTS
- ATTRACTS WORKER ANTS TO THE BAIT STATIONS
- FOR COMMON HOUSEHOLD ANTS
- [KILLS] - OR - [FOR] COMMON HOUSEHOLD ANTS

- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- GREAT VALUE

- [Bonus Pack] (*applies to packs to which more baits are added*)
- [50% More Free] (*applies to packs to which 50% more baits are added*)
- [6 Bonus Baits With Purchase] (*applies to packs to which 6 more baits are added*)

[EFFECTIVENESS GUARANTEED: COMBAT[®] stands behind this insect killing system with a full Satisfaction Guarantee.]

[Should you have any questions regarding COMBAT[®], please call 1-800-426-6228.] [For more information, call the COMBAT[®] Labs Information Helpline at 1-800-426-6228 -or- For questions or comments, please call the COMBAT[®] Labs [Information] Helpline at 1-800-426-6228 [for more information]. -or- [Call the COMBAT[®] Helpline at 1-800-426-6228 for information.] -or- Questions or Comments? Call 1-800-426-6228.]



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

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]
Underlined text is new.

9/9
Master Label, July 2007
EPA Reg. No. 64240-3
Combat Ant Killing System
Pg 6 of 6

UNIT LABEL

COMBAT[®] Ant Killing System

THIS SIDE DOWN OR AGAINST SURFACE

NOTE: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylnon† 1.0%

OTHER INGREDIENTS: 99.0%

†CAS No. 67485-29-4

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATION.

CAUTION:

DISPOSAL: If empty: Do not reuse this container. Place in trash. **If partially filled:** Call you local solid water agency or toll free number **1-800-CLEANUP** 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. - *or* - [For questions or comments, please] Call the COMBAT[®] [Information] Helpline at 1-800-426-6228 [for more information].

Distributed by & ©2007 Combat Insect Control Systems
[15101 N. Scottsdale Rd.,] Scottsdale, AZ 85254

EPA Reg. No. 64240-3
EPA Est. No. 071106-GA-001

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT. [0.035oz (1g)]