

64240-3

2/2/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Georgia Anastasiou, Agent
Combat Inset Control Systems
c/o Henkel Consumer Goods Inc.
1900 N. Scottsdale Road
Scottsdale, AZ 85255

FEB - 2 2011

Subject: Label Notification(s) for Pesticide Registration PR Notice 2007-4

Dear Ms. Anastasiou:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 9, 2010 for:

EPA Registration Number: 64240-3 Combat Ant Killing System

The Registration Division (RD) has conducted a review of this request for applicability Under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our Records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Melody Banks on 703 305-5413.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez", written over a horizontal line.

Mark Suarez
Product Manager 13
Insecticide Branch
Registration Division (7504P)



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 64240-3	2. EPA Product Manager Mark Suarez	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Ant Killing System	PM# 11	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 <i>NOTE: PLEASE SEND ALL CORRESPONDENCE TO</i> <i>"CONTACT POINT" LISTED BELOW</i> <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 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 TO UPDATE STORAGE & DISPOSAL PER PR NOTICE 2007-4

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statements to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§156.10, 156.140, 156.144, 156.146 and 156.156, 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:				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	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No			<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		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
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"/> Other _____ <input 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 Georgia Anastasiou - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3993 ext. 19
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 <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date August 9, 2010	

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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

August 9, 2010

VIA COURIER

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard, Room S4900
2777 S. Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Mark Suarez
Product Manager, Team 11

SUBJECT: Combat Insect Control Systems
Notification per PR Notice 2007-4 for the following products
Combat Fire Ant Killer (EPA Reg. No. 64240-1)
Combat Ant Killing System (EPA Reg. No. 64240-3)
Combat Roach Killing System I (EPA Reg. No. 64240-4)
Combat Ant Control Formula System II (EPA Reg. No. 64240-5)
Combat Superbait Brand Granular Ant Killer (EPA Reg. No. 64240-25)
Combat Regular Roach Bait 0.5% HM (EPA Reg. No. 64240-27)
Combat Roach Gel (EPA Reg. No. 64240-35)

Dear Mr. Suarez:

On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

To support the notifications, enclosed please find the following documents for each product:

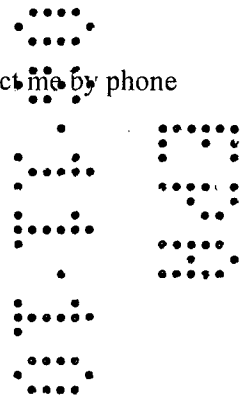
1. Application for Pesticide which includes the PR Notice 2007-4 certification;
2. One (1) copy of the label with changes highlighted; and,
3. Two (2) copies of the label.

If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou

Georgia Anastasiou
Agent for,
Combat Insect Control Systems



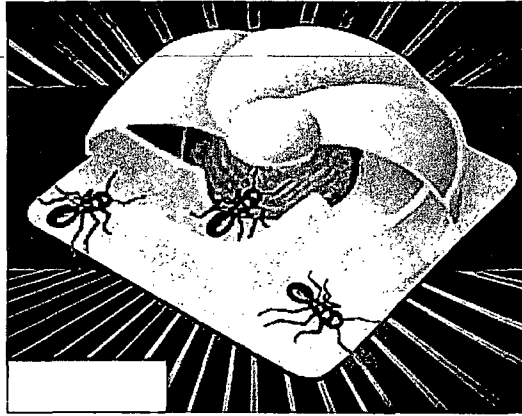
cc: David Rickard (Combat)

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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.]
Highlighted text is new.

Master Label, August 2010
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.

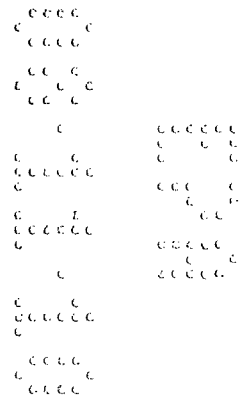
CAUTION

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.
Distributed by & ©2010
Combat Insect Control Systems
19001 N. Scottsdale Rd. Scottsdale, AZ 85255
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



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Master Label, August 2010
EPA Reg. No. 64240-3
Combat Ant Killing System
Pg 2 of 6

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: 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.

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.

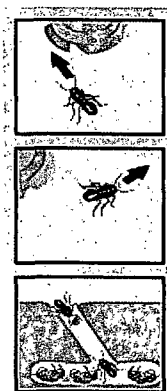
DIRECTIONS FOR USE

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.



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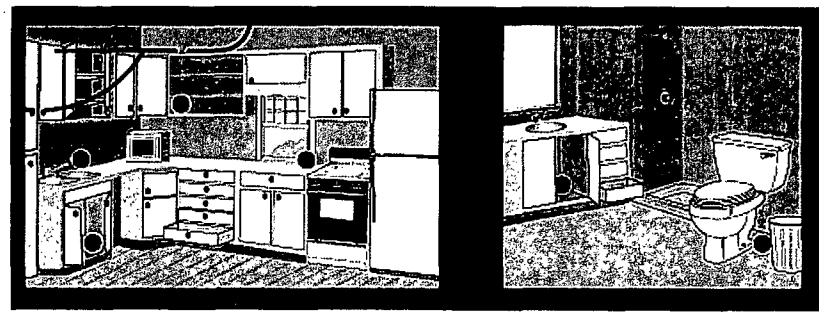
DIRECTIONS FOR USE - GENERAL INFORMATION, Continued

- 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.

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

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.]

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Master Label, August 2010
EPA Reg. No. 64240-3
Combat Ant Killing System
Pg 6 of 6

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UNIT LABEL

COMBAT[®] Ant Killing System

THIS SIDE DOWN OR AGAINST SURFACE

NOTE: Do not remove or puncture this label.

ACTIVE INGREDIENT: Hydramethylon† 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: 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.

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 & ©2010 Combat Insect Control Systems
19001 N. Scottsdale Rd.Scottsdale, AZ 85255

EPA Reg. No. 64240-3

EPA Est. No.

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT. [0.035oz (1g)]