

64240 -3

3/17/2011

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

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Combat Insect Control Systems
c/o Lewis & Harrison
122 C Street, N.W., Suite 740
Washington, D.C. 20001

MAR 17 2011

Subject: Amendment for Child-resistant Packaging Certification
EPA Reg. No. 64240-3
Submission dated October 26, 2010
Decision No: 441595, S: 884629

Dear Ms. Anastasiou:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this action, please contact Rosanna Louie-Juzwiak at (703) 308-0037.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Suarez".

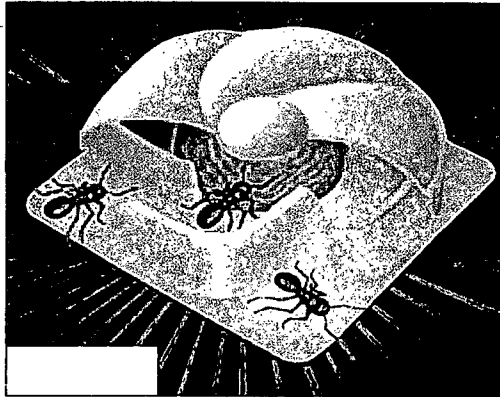
Mark Suarez
Product Manager 13, Insecticide Branch
Registration Division (7505P)

Enclosure: Combat Ant Killing System Label, Stamped *Accepted*

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

Master Label, March 17, 2011
EPA Reg. No. 64240-3
Combat Ant Killing System
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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%
 TOTAL 100.0%
 †CAS No. 67485-29-4

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

CAUTION

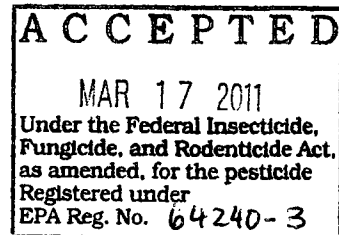
SEE PRECAUTIONARY STATEMENT *-or-* PRECAUTIONS ON END *-or-* SIDE *-or-* BOTTOM *-or-* BACK PANEL

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

EPA Reg. No. 64240-3
 EPA Est. No.
 Distributed by & ©2011
 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 [2] [4] [6] [12] NUMBER CHILD-RESISTANT [BAIT] STATIONS



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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 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.

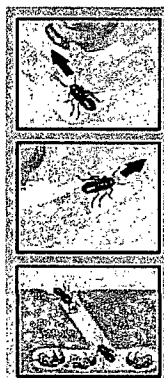
DIRECTIONS FOR USE

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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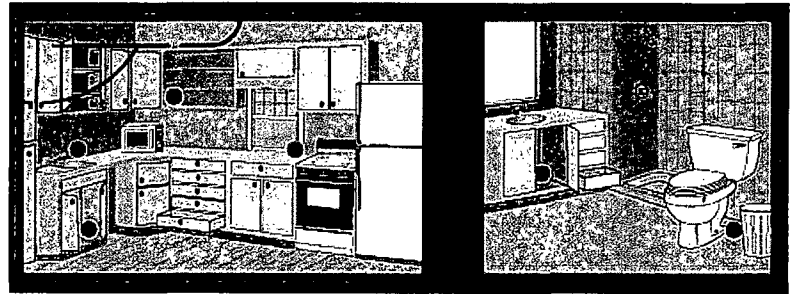
DIRECTIONS FOR USE - GENERAL INFORMATION, Continued

- 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.
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

Not to exceed 12 bait stations:

- 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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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%
<u>OTHER INGREDIENTS:</u>	<u>99.0%</u>
TOTAL.....	100.0%

†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 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].

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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)]