

64240-3

07/09/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION
JUL - 9 2012

Ms Georgia Anastasiou
Agent for Combat Insect Systems
Lewis & Harrison
122 C Street N W Suite 740
Washington DC 20001

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 June 26 2012 for the following product(s)

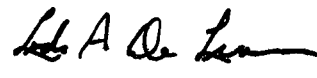
Combat Ant Killing Bait Alternate Brand Name

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^o Ant Killing System EPA Reg No 64240 3

If you have any questions please contact Linda A DeLuise at 703 305 5428

Sincerely


Richard J Gebken
Product Manager
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 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 <u> NOTIFICATION </u> Product Name <u> JUL - 9 2012 </u>

Section II

- Amendment Explain below
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- Me Too Application
- Notification Explain below
- Other Explain below

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

Notification of the Alternate Brand Name **Combat Ant Killing Bait**

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 52 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 EPA I further understand that if this notification is not consistent with the terms of PR Notice 95 2 and 40 CFR 152 46 this product may be in violation of FIFRA and I may be the 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes Unit Packaging wgt No per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes Package wgt No per container	2 Type of Container <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			
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"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

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 3903 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 	3 Title Agent for Combat Insect Control System		
4 Typed Name Georgia Anastasiou Lewis & Harrison LLC	5 Date June 26 2012		

LEWIS & HARRISON

122 C Street NW Suite 740
Washington DC 20001
telephone 202 393 3903
fax 202 393 3906

Consultants in Government Affairs

June 26 2012

HAND DELIVERED

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U S Environmental Protection Agency
One Potomac Yard
2777 S Crystal Drive
Arlington VA 22202

ATTENTION **Mark Suarez**
 Product Manager Team 11

SUBJECT **Combat Insect Control Systems**
 Combat Ant Killing System (EPA Reg No 64240 3)
 Notification per PR Notice 98 10 Alternate Brand Name

Dear Mr Suarez

On behalf of Combat Insect Control Systems I submitting a notification to propose the following
alternate brand name for the product Combat Ant Killing System (EPA Reg No 64240 3)

Combat Ant Killing Bait

In support of this submission enclosed please find an Application for Pesticide Notification which
includes a signed statement certifying compliance with PR Notice 98 10 and a copy of the master label
with the proposed brand name

If you have any questions please contact me at 202 393 3903 ext 19 or by email at
georgia@lewisharrison.com

Sincerely



Georgia Anastasiou
Agent for
Combat Insect Control Systems

cc Patricia McFadden (Combat Insect Control Systems)

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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]

Master Label June 26 2012
EPA Reg No 64240 3
Combat Ant Killing System
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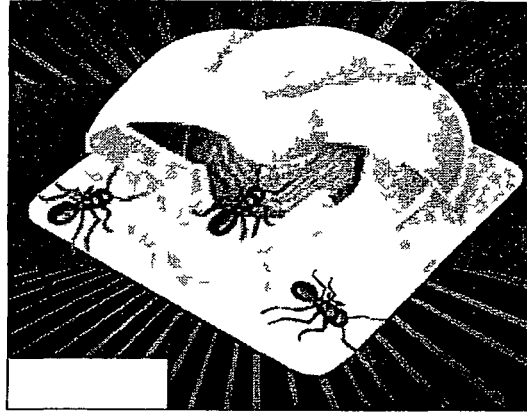
COMBAT[®] Ant Killing System

Approved Alternate Brand Name

[Combat Source Kill 4]

Proposed Alternate Brand Name

[Combat Ant Killing Bait]



[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

NOTIFICATION

JUL - 9 2012

ACTIVE INGREDIENT	Hydramethyln†	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

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

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

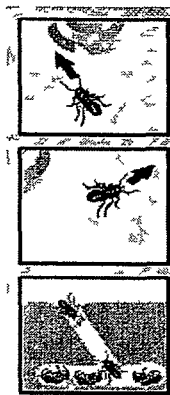
DIRECTIONS FOR USE

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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Combat Ant Killing System
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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

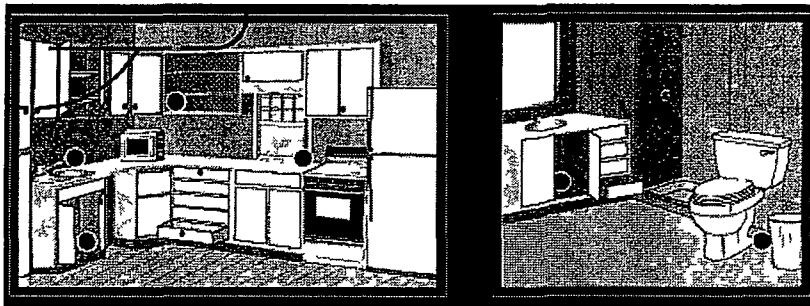
This product is easy to use and has no insecticide odor

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-

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%
OTHER INGREDIENTS		99 0%
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]

Distributed by & ©2011 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)]