



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 18, 2016

Georgia Anastasiou  
Agent for Combat Insect Control Systems  
c/o Lewis & Harrison  
122 C Street, N.W. Suite 505  
Washington, DC 20001

Subject: Label Amendment – Revising company address, adding claims, and addition marketing statements.  
Product Name: Combat Ant Killing System  
EPA Registration Number: 64240-3  
Application Date: October 15, 2015  
Decision Number: 510503

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

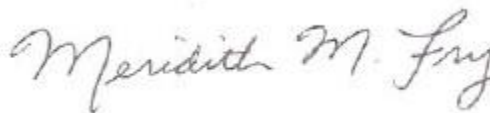
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

with FIFRA section 6. If you have any questions, please contact Jennifer Gaines at 703-305-5967 or via email at [gaines.jennifer@epa.gov](mailto:gaines.jennifer@epa.gov).

Sincerely,

A handwritten signature in dark ink, reading "Meredith M. Fry". The signature is written in a cursive style with a large, stylized "M" and "F".

Meridith M. Fry, Ph.D., Product Manager 4  
Invertebrate & Vertebrate Branch 1 (IVB1)  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# COMBAT<sup>®</sup> Ant Killing System

*Approved Alternate Brand Name:*

[Combat Source Kill 4]  
[Combat Ant Killing Bait]

**ACCEPTED**

Apr 18, 2016

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 64240-3



[ANT]

## FOR INDOOR AND OUTDOOR USE

- KILLS [THE] QUEEN & [THE] 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 STATEMENTS **-or-** PRECAUTIONS ON END **-or-** SIDE **-or-**  
BOTTOM **-or-** BACK PANEL

[COMBAT<sup>®</sup> GUARANTEED to work or your money back]

EPA Reg. No. 64240-3

EPA Est. No.

[Manufactured for] [Distributed by] [&] ©[Year] Combat Insect Control Systems

[7201 E. Henkel Way] Scottsdale, [AZ] [Arizona] 85255

MADE IN [U.S.A.][KOREA]

[U.S. Patent Nos. \_\_\_\_\_] and other patents pending.]]

TOTAL NET WT. \_\_\_\_\_

[CONTAINS] [2] [4] [6] [12] CHILD-RESISTANT [BAIT] STATIONS

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and 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

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

**CONTAINER HANDLING:** **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. Never place unused product down any indoor or outdoor drain.

*[Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station].*

### [USE INFORMATION]

[THIS IS] [HOW] COMBAT<sup>®</sup> [Approved Alternate Brand Name] [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.]

[1]



[2]



### ***[USE INFORMATION] Continued***

- [This product contains a 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.]

### **[USE RESTRICTIONS]**

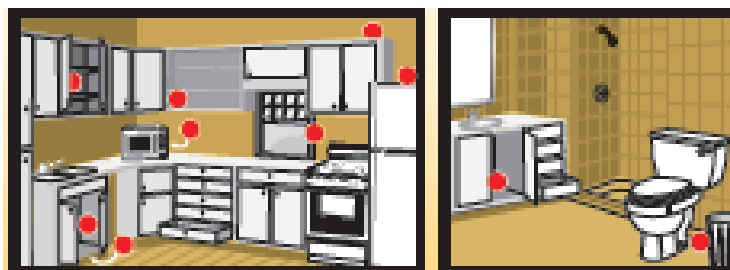
Do not remove or puncture [the] [white] label on bait stations.

### **DIRECTIONS FOR USE**

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

### **[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 ants 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.

***Optional Claims for Front or Back:***

- ODORLESS
- CHILD-RESISTANT [BAIT]S [STATIONS]
- EASY – TO – USE
- NO VAPOR, FUMES OR ODOR
- KILLS THE QUEEN AND THE ENTIRE COLONY
- [DESTROYS] [KILLS] THE [NEST] [COLONY]
- NO INSECTICIDE ODOR
- KILLS COMMON OUTDOOR ANTS, INCLUDING FIRE ANTS
- INDOOR AND OUTDOOR USE
- ATTRACTS WORKER ANTS TO THE BAIT STATIONS
- FOR COMMON HOUSEHOLD ANTS
- [KILLS] - OR - [FOR] COMMON HOUSEHOLD ANTS
- Kills ants 24/7
- Kills non-stop Effective killing

***Not to exceed 12 bait stations:***

- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- [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***)
- [x] [x [Bait]] [[x%] More<sup>††</sup> [With Purchase]
- [x%] for free<sup>††</sup> [With Purchase]
- [X][Extra] [Free] [Bonus] [Bait(s)]<sup>††</sup> [With Purchase] <sup>††</sup> [for free]
- More Baits [– Better Value]
- Value Pack [– More Baits]
- Value Size [– More Baits]
- Better Value
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack
- Kill the ones you see and the ones you don't [see]
- Kill[s] [the] [entire] nest [colony]
- [Your] Secret weapon [against ants]

<sup>††</sup>vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]





***Smaller Bait Count Claims:***

- Trial Size
- Prevention Pack
- Duo Pack
- Value Size
- For [small] [minor] [roach] [ant] infestations only
- [Ant] [Bait] Trial Pack
- [Use] [For] [on] [a] [Small] [minor] [ant] [roach] [Colony] [nest] [Use]
- New [Size] [Bait Count]
- 2-Pack
- Use all baits [, recommend for small infestations,] larger infestations may require more [bait stations] [than one box]
- Moderate [or severe] ant problems may require 2 boxes [or more]
- Number of bait stations needed varies depending on the size of the infestation

***Optional Henkel statements for front or back or side panel:***



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

[Guaranteed to work] [or your money back][!]

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

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]



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



**UNIT LABEL**

# COMBAT<sup>®</sup> 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%  
TOTAL.....100.0%

†CAS No. 67485-29-4

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

## CAUTION:

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

Distributed by & © [Year] Combat Insect Control Systems  
[7201 E. Henkel Way] Scottsdale, [AZ] [Arizona] 85255

EPA Reg. No. 64240-3

EPA Est. No.

Made in Korea

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS
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[Total] NET WT. [0.035oz (1.0g)]