

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Stephen Smith
Combat Insect Control Systems
c/o PS&RC P.O. Box 493
Pleasanton, CA 94566-0803

MAY 30 1997

Subject: Amended Product Labeling
Combat Superbait Brand Granular Ant Killer
EPA Registration Number 64240-25
Submission Dated November 15, 1996

Dear Mr. Smith,

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below.

- 1. Inserted into one of the lines of the product feature column listings are the statements:

"Easy to use • No mixing" after the words "Easy to use."

This inserted label text is partially redundant and should be revised accordingly.

- 2. Insertion of the language:

"7. BROADCAST TREATMENT: For general control of [fire] ants outdoors around your yard, sprinkle granules lightly in the yard. One package will treat [up to] a half acre -or- X square feet -or- yards."

The final submitted labels must have the appropriate units inserted into the last sentence of section 7.

However, your request to optionally place the ingredient statement on the back panel of the product label is unacceptable. The mock label presented to the Agency failed to adequately demonstrate a need for movement of the ingredient statement to the back panel of the product package. Typically this request is only allowed when extreme labeling limitations are apparent because of labeling size.

CONCURRENCES							
SYMBOL	7	7505C					
SURNAME		M. J. J.					
DATE		5/28/97					

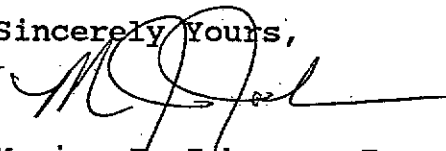
293

Page 2
6240-25

Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

A stamped copy of the label is attached for your records.

Sincerely Yours,



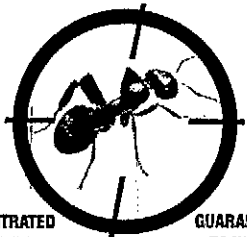
Marion J. Johnson, Jr.
Product Manager 10
Insecticide-Rodenticide Branch
Registration Division (7505C)

BEST AVAILABLE COPY

ACCEPTED WITH COMMENTS IN EPA LETTER DATED MAY 20 1997 UNDER THE FEDERAL INSECTICIDE ACT, FOR THE PESTICIDE, COMBAT SUPERBAIT BRAND GRANULAR ANT KILLER, EPA REG. NO. 64240-25

COMBAT

**SUPERBAIT®
BRAND GRANULAR
ANT KILLER**



CONCENTRATED FORMULA GUARANTEED TO WORK

Also kills crickets and outdoor roaches

- Kills ants outdoors before they come indoors
- Kills the queen and kills the entire colony
- Guaranteed or your money back
- Child resistant top
- Protects your home from ant infestations
- Kills a wide variety of ants
- Kills many types of ants
- Kills sugar and grease-eating ants
- Kills most common varieties of ants
- Protects your home from many varieties of ants
- Easy to use • Easy to use • No milking
- Unique, delayed action formula allows ants to carry bait back to the nest where the entire colony is killed
- Kills ant colonies within one week
- Granules are easily carried back to the colony
- Granules are tiny and blend-in with dirt and sand
- Light brown coloring allows bait to blend-in with dirt and sand
- Not readily visible to children and pets
- Gets to the source of infestation
- New-bait formula
- Does not repel ants
- Kills Fire Ant mounds
- The granules attract worker ants who carry the bait back to the nest where the entire colony, including the queen, is killed
- Concentrated formula
- Will not clump or clog in container

ACTIVE INGREDIENT: Hydramethylnon (tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone, (3-(4-(trifluoromethyl)phenyl)-1-(2-(4-trifluoromethyl)phenyl)ethyl)-2-propenylidene)hydrazine) 1.0%
INGREDIENTS: 99.0%

Now with COMBAT® SuperBait® Brand Granular Ant Killer you can kill ants - and/or - crickets outdoors before they become indoor pests. Foraging ants bring the granules back to their nest so that the queen and the entire colony are killed.

Now with COMBAT® SuperBait® Brand Granular Ant Killer you can kill ants - and/or - crickets outdoors before they come indoors. This unique, delayed-action bait allows worker ants, looking for food and water, enough time to bring the granules back to their nest where the queen and the colony feeds on it and dies.

COMBAT® SuperBait® Brand Granular Ant Killer contains a patented delayed-action insecticide, hydramethylnon, that kills a wide variety of ants such as Fire, Argentine, Pharaoh, Carpenter, Pavement, Honey, Acrobat, Cornfield, False Honey, Odorous House, Thief, Dig-headed, Field, Harvester and Pyramid ants.

COMBAT® SuperBait® Brand Granular Ant Killer kills the queen(s), which is one of the most effective ways to control ants. The colony cannot survive without the queen(s). One of the most effective ways to control ants is to eliminate the queen(s) back in the nest. The colony cannot survive without the queen. COMBAT® SuperBait® Brand Granular Ant Killer kills the queen and the entire colony.

This is how COMBAT SuperBait Brand Granular Ant Killer works:



COMBAT
**SUPERBAIT®
BRAND GRANULAR
ANT KILLER**

DIRECTIONS FOR USE:

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Wear gloves when using the product and wash hands thoroughly after handling.

1. For general control of ants - and/or - crickets outdoors - and/or - outdoor roaches around your home, garage or any other building.
Directions for use for the bottle with measuring cap:
Pour granules into the bottle cap to the 1/2 - or - 1 oz fill line. (Lightly apply one cap (about 1/2 table spoonful) (1/2 oz) of granules every 10 feet around the perimeter of your home.) - or - (Lightly apply around the perimeter of your home using 1 oz (about three table spoonfuls) for every 20 feet.) Sprinkle granules sparingly so that they are barely visible.
Directions for use for the tip and measure dosing bottle:
Turn the container upside-down to fill 1/2 oz of granules into the doser. Apply granules from the doser around the perimeter of your home using one dose (1/2 oz) per 10 feet. Sprinkle granules sparingly so that they are barely visible.
2. One container is sufficient to treat an average sized home. For best results, apply granules in shaded areas (i.e. under overhangs, next to foundations).
3. For localized activity such as ant hills, mounds, and/or trails, fill the cap/doser to 1 oz and apply - or - measure or sprinkle approximately 1 oz of granules around each ant hill, mound, or trail. For best results, do not put the granules directly in or on the mound. Do not disturb the mound. This will aggravate the ants and cause them to move their mound.
4. After application, you may see increased ant activity around COMBAT SuperBait Brand Granular Ant Killer granules. Do not spray or interfere with their feeding. The ants need time to take the granules back to the colony to kill the queen and the entire colony.
5. You should expect to see a significant reduction in ants - and/or - crickets - and/or - outdoor roaches within a week.
6. Repeat treatment after one week if infestation persists or if large colonies are involved.
7. For best results, apply late in the day when ants - and/or - crickets - and/or - outdoor roaches are more active. Avoid outdoor application if rain threatens.
8. **BROADCAST TREATMENT:** For general control of fire ants outdoors around your yard, sprinkle granules lightly in the yard. One package will treat up to a half acre - or - X square feet - or - yards.

PRECAUTIONARY STATEMENTS:

CAUTION: HAZARDS TO HUMANS.
May be harmful if swallowed. Avoid contact with skin or eyes. Wash hands thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: If swallowed, drink one or two glasses of water and induce vomiting by touching back of throat with finger. Call physician or poison control center at once. Do not induce vomiting or give anything by mouth to an unconscious person.

HAZARDS TO DOMESTIC ANIMALS: Pets may be attracted to this product. Keep pets away from treated areas for at least 24 hours after application.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

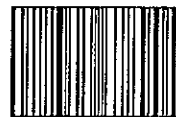
STORAGE AND DISPOSAL: Keep in original container. Store in cool, dry, secure place. Do not rinse can. Discard in trash.

Should you have any questions regarding COMBAT® SuperBait® Brand Granular Ant Killer, please call the COMBAT-Ant Expert Hotline: 1-800-426-6228.

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1221 Broadway, Oakland, CA 94612 MADE IN U.S.A.
EPA Reg. No. 64240-25

EPA Est. No. 39578-1X-01

U.S. Patents Nos. RE 29,358; 4,087,525; 4,163,802; 4,353,907; 4,563,836; 4,647,922; DES 278,642 and other patents pending.
[This package is sold by weight, not by volume. You can be assured of proper weight even though some settling of contents normally occurs during shipping and handling.]



393