

64240-25

2/2/2011

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

FEB - 2 2011

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

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: 64240-25 Combat Superbait Brand Granular Ant Killer**

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 white background.

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 <b>64240-25</b>	2. EPA Product Manager <b>Mark Suarez</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Combat Superbait Brand Granular Ant Killer</b>	PM# <b>11</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255</b> <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. _____ 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 <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC, 122 C St. NW #740, Washington DC 20001</b>	Title <b>Agent for Combat Insect Control Systems</b>	Telephone No. (Include Area Code) <b>202-393-3903 ext. 19</b>
<b>Certification</b> 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. Data Application Received (Stamped)
2. Signature <i>Georgia Anastasiou</i>	3. Title <b>Agent for Combat Insect Control System</b>	
4. Typed Name <b>Georgia Anastasiou - Lewis &amp; Harrison, LLC</b>	5. Date <b>August 9, 2010</b>	

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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.

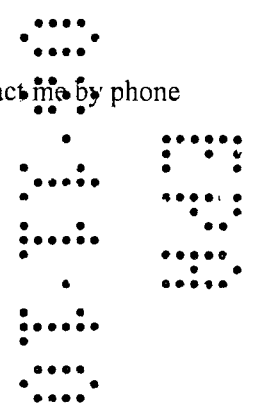
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com).

Sincerely,

*Georgia Anastasiou*

Georgia Anastasiou  
Agent for,  
Combat Insect Control Systems

cc: David Rickard (Combat)



4 of 7

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!

Pg 1 of 4

Master Label, August 2010  
EPA Reg. No. 64240-25  
Combat Superbait Brand Granular Ant Killer

# COMBAT®

## Superbait Brand Granular Ant Killer

### Concentrated Formula

ACTIVE INGREDIENT: Hydramethylnon†.....1.0%

OTHER INGREDIENTS: .....99.0%

†CAS No. 67485-29-4

KEEP OUT OF REACH OF CHILDREN AND PETS

## CAUTION

See end – or – side – or bottom – or – back panel for additional precautionary statements.

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. 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.

**HAZARDS TO DOMESTIC ANIMALS:** Pest 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.

Distributed by & © 2010 Combat Insect Control Systems  
19001 N. Scottsdale Rd. Scottsdale, AZ 85255  
EPA Reg. No. 64240-25  
EPA Est. No. \_\_\_\_\_

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

Warehouse Pack -or- Twin Pack

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

Combat GUARANTEED to work [or your money back]

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## DIRECTIONS FOR USE

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

### GENERAL INFORMATION

#### *Claims for front or back*

- 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 sugar and grease-eating ants
- Protects your home from many varieties of ants
- Easy to use/ Ready-to-use
- No mixing
- Unique, delayed action formula allows ants to carry bait back to the nest where the entire colony is killed.
- Kills any 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 pests
- Gets to the source of infestation
- Does not repel ants
- 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
- Even kills Fire Ants
- Should you have any questions, regarding this product please call the Combat Ant Expert Hotline: 1-800-426-6228

Now with this product 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 this product 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 feed on it and die.

This product contains a patented delayed-action insecticide, hydramethylnon, that kills a wide variety of ants such as Fire, Argentine, Pharaoh, Carpenter, Pavement, Honey, Acrobat, Cornfield, Odorous House, Thief, Big-headed, Field and Harvester.

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This product 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 at the nest. The colony cannot survive without the queen. This product kills the queen and the entire colony.

[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]

**This is how this product works:**

1. Sprinkle granules
  2. The granules attract worker ants
  3. Worker ants carry the bait back to the nest where the entire colony including the queen is killed
- or-
1. Sprinkle granules
  2. Ant take baits – return to nest – kill the queen & entire colony

*The label may include illustrations of how the product works.*

**GENERAL PRECAUTIONS AND RESTRICTIONS**

Wear gloves when using the product and wash hands thoroughly after handling.  
Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.

**APPLICATION INSTRUCTIONS**

[One package will treat [up to] a half acre -or- 21,780 square feet -or- 2,420 yards]

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 ½ -or- 1oz fill line. [Lightly apply one cap (about 1 1/2 table spoonfuls) (½ 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 tablespoonfuls) 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 ½ oz of granules into the doser. Apply granules from the doser around the perimeter of your home using one dose (½ oz) per 10 feet. Sprinkle granules sparingly so that they are barely visible. One container is sufficient to treat an average sized home. For best results, apply granules in shaded area (i.e. under overhangs, next to foundations.)
2. For localized activity such as ant hills, mounds and/or trails, (fill the cap/dose) 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.

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**Do not disturb the mound.** This will aggravate the ants and cause them to move their mound.

3. After application, you may see increased ant activity around 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 entire colony.
4. You should expect to see a significant reduction in ants -and/or- crickets -and/or- outdoor roaches within a week.
5. Repeat treatment after one week if infestation persists or if large colonies are involved.
6. 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.
7. **BROADCAST TREATMENT:** For general control of [fire] ants outdoors around your yard, sprinkle granules lightly in the yard.

**STORAGE AND DISPOSAL**

**STORAGE:** Keep in original container. Store in cool, dry, secure place. Do not rinse can.

**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. 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 number will be laser-coded on each primary package of the product after the container is sealed.*