

PM 10

64240-30

6/17/97

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 17 1997

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

Dear Mr. Smith:

Subject: Combat Ant Bait F1
EPA Reg. No. 64240-30
Submissions dated 3-26-97 and 3-20-97

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. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

In our meeting of May 8, 1997, you amended your submission to delete "18" stations from both the label and the application for an amendment. You further clarified that you will package this product in unit packaging of 6-12 units. In addition, you amended the directions for use to remove references to 18 units. To complete these changes, you must further revise the directions for use to refer to the appropriate package size. For example, a package of six may not require more than six bait stations. You must also amend the total net weight to reflect the net weight of 6-12 units.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



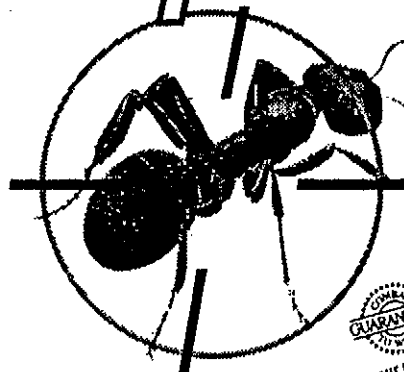
Marion Johnson
Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (7505C)

CONCURRENCES

SYMBOL	PNT10						
SURNAME	A. Sibold						
DATE	6/17/97						

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 17 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
64240-30FOR INDOOR AND
OUTDOOR (adjacent
to the home) USE:Destroys Queen
and Colony**COMBAT**

or your money back

**ANT
BAIT F1**ACTIVE INGREDIENT: Fipronil [5-Amino-
1-(2,6-dichloro-4-(trifluoromethyl)
phenyl)-4-(1,1,1-trifluoroethyl)-
sulfonyl]-1H-pyrazole-3-carbonitrile 0.01%
INERT INGREDIENTS: 99.99%

For front or back:

- [New] [Kills ants quickly]
- [New] Quick kill formula
- [New] fast formula
- Kills [the] queen and [the] [entire] colony
- Destroys the nest/colony
- Kills the ant source
- Kills the ant egg source
- Kills the ant nest fast
- Kills the nest fast
- Fast nest kill
- Kills the ant nest [colony]
- Kills the ants you see and ones you don't see
- Destroys queen and colony

6 or

CONTAINS 12 ~~or 18~~ BAIT STATIONS (AND STAKES)

- Kills ants continuously
- Kills non-stop
- Long lasting power
- Kills quickly and keeps on killing
- Ongoing ant control
- Non-stop ant control
- Provides long lasting ant killing power
- Kills ants without messy residue and without insecticide odors/tunes
- [This product] kills common household ants, including: Pharaoh Ants, Argentine Ants, [Black Carpenter Ants], Little Black Ants, Cornfield Ants, Odorous House Ants, Pavement Ants, and Fire Ants

- Leaves no residue or odor
- Kills indoor and outdoor ants
- Kills grease and sugar loving ants
- Kills entire colony
- One box is powerful enough to kill the entire colony [nest]
- Kills ants without insecticide odors [tunes]
- Ants carry bait back to the colony to kill the queen and other ants before they come inside your home
- Kills ants outdoors (adjacent to the home) before they come indoors
- Kills the entire ant colony before they come indoors

- Kills common outdoor ants, including fire ants
- Kills the queen and [the] entire colony
- Kills ants outdoors before they come indoors

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

TOTAL NET WT 0.64 to 0.95 oz or (18 to 27 grams)

COMBAT
ANT BAIT F1U.S. Patents Nos. EPA Reg No. 64240-30 Est. No. 5813-M2-01
and other patents pending(The paperboard in this) [C] carton
[contains] [is made from] _____ %
recycled fiber (minimum
post-consumer content)©1995 Combat Insect Control Systems
1221 Broadway
Oakland, CA 94612
MADE IN U.S.A.COMBAT
PROOF OF PURCHASEUPC CODE
XXXXX
001

MAR 27 P 3:40 97

RECD EPA/OP/DPD1

R-10004-3.
(master)

4 to 2

COMBAT[®] ANT BAIT FL

• ODOORLESS • CHILD-RESISTANT • EASY-TO-USE
• KILLS THE QUEEN AND THE ENTIRE COLONY
• NO INSECTICIDE ODOR • KILLS COMMON OUT-
DOOR ANTS, INCLUDING FIRE ANTS • ATTRACTS
WORKER ANTS TO THE BAIT STATIONS

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.

*Guaranteed to work or your
money back!*

- This product contains a totally unique insecticide ingredient which kills most ants commonly found in households -or- homes. This product is 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 (adjacent to) your home to prevent more ants from coming inside.
- This product kills the following ants which feed on sweet and greasy materials: Fire, Argentine, Black Carpenter, Cornfield Ants, Little Black, Odorous House, and Pavement Ants.
- This product is effective because ants carry bait back to the colony to kill the queen and entire colony. -or- Ants carry the bait back to where they live to kill the queen and entire colony.
- This product is easy to use and has no insecticide odor.
- No insecticide fumes or mess
- Child Resistant

THIS IS HOW THE COMBAT[®] ANT BAIT FL WORKS:

1

Ants enter bait station and begin eating bait.

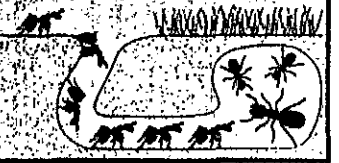
This product will attract foraging worker ants to the bait feeding station. The ants will feed on the bait.



2

Worker ants feed back to colony and kill queen and other ants.

Worker ants will take some of the bait back to the nest where they pass it on to kill the queen & entire colony.



To prevent ants from coming indoors, place bait station -or- stake every 15 to 20 feet around the perimeter of your home.



For more information, call the Combat[®] Labs Information Helpline at 1-800-426-6228. -or- [For questions or comments, please c] [C]all the Combat[®] Labs [information] Helpline at 1-800-426-6228 [for more information].

DIRECTIONS FOR USE:

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

(Note: do not remove or puncture white label on bait stations.)

1. Break COMBAT bait stations apart from plastic frame. Do not remove or puncture label on bait stations. Use all ~~16~~ 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 ~~16~~ stations at the same time.
-or- Remove wrapper and break bait stations apart. Do not remove or puncture the label on bait station[s]. The baits are now ready to use. Use all 16 or 121 -or- 112 ~~ant~~ [ant] baits at the same time for thorough control.
2. (Simply) place each bait station by ant trails or close to areas where ants are numerous. [Inside, COMBAT can be placed in cabinets, next to dishes, or anywhere your ant problem occurs. Do not spray the bait stations. Place additional COMBAT bait stations near cracks, along sills or anywhere that ants might enter your home.]
-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 stations near cracks or crevices, along sills, or anywhere ants may gain entry indoors -or- that ants might enter your home. Do not spray insecticide on or around the bait stations.
3. Outside (adjacent to) your home, place additional COMBAT bait stations near cracks and crevices, along sills, or anywhere ants may gain entry.
-or- Secure stations to the ground by pushing the stake through the hole in the corner of the station and into the ground. TIP: The bait will be held more securely if the stake is pushed all the way in with the arm of the stake firmly on the lid of the bait station.
-or- Stations may be secured to the ground by pushing the stake through the hole in the corner of the station. The stake may be hammered in place if necessary. The station will be held more securely if the stake is pushed all the way in with the arm across the top of the station.
-or-

Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within a few days. TIP: For best results, do not interfere with the ants or the bait stations during the use because ants must carry bait back to the nest to kill the queen and the entire colony.

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 -or- a few days. [TIP:] 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 -or- nest to kill -or- destroy the queen and the other ants -or- the entire colony.
-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 its use because ants must carry bait back to the nest to kill the queen and the entire colony.

5. Replace all bait stations after 3 months of [indoor] use to keep ants from reappearing -or- returning.
-or- For continuous control of ants, replace all bait stations after 8 weeks of use outdoors.
-or- Do not spray on or around the bait stations. Sprays will contaminate the baits and reduce their effectiveness.

DISPOSAL: Wrap bait stations in several layers of newspaper and discard in trash.

-or-

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Do not remove baits from [bait] station[s]. Wrap bait stations in several layers of newspaper and discard in trash.

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION

Wash thoroughly with soap and water after handling bait stations.

EPA Reg. No. 64240-30
EPA Est. No. 5813-MS-01
U.S. Patents Nos.
and other patents pending.

R-10004-3
(master)

3
7
4

The artwork is shown below at 200% of actual size.



THIS SIDE DOWN: This side should be placed against surface.

(Note: Do not remove or puncture this label.)

ACTIVE INGREDIENT: Flupronil {5-Amino-
1-(2,6-dichloro-4-(trifluoromethyl)
phenyl)-4-(1,1,1-trifluoro-2-methyl-
sulfonyl)-1H-pyrazole-3-carbonitrile} 0.01%

INERT INGREDIENTS: 99.99%

CAUTION: DO NOT ALLOW CHILDREN OR PETS

TO PLAY WITH THE BAIT STATIONS.

DISPOSAL: Wrap used bait station in several layers of newspaper and discard in trash.

For more information, call the Combat® Labs Information Helpline at
1-800-426-6228. -or- [For questions or comments, please c] [C]all the
Combat® Labs [Information] Helpline at 1-800-426-6228 [for more
information].

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1221 Broadway

Oakland, CA 94612

EPA Est. No. 5813-MS-01

NET WT 0.05 oz (1.5 g.)

EPA Reg. No. 64240-30

SEE OUTER CARTON FOR COMPLETE DIRECTIONS
AND ADDITIONAL PRECAUTIONARY STATEMENTS.

RU-10004-2(master)

h b h