

64240-30

11/24/2006

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 24 2006

Dial Corporation  
Bob Brennis, Agent for Dial Corporation  
Lewis & Harrison  
122 C Street, N.W. Suite 740  
Washington, DC 20001

Dear Mr. Brennis:

Subject: Combat Ant Bait F1  
EPA Reg. No. 64240-30  
Submission dated 8/28/06

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.

Delete all claims to kill pharaoh and carpenter ants. You must submit data to support these claims. Claims to kill fire ants are acceptable, as there are acceptable data on file to support fire ant kill claims.

Delete all claims to destroy or kill the queen and the colony for fire ants, carpenter ants and pharaoh ants. You must submit data to support these claims.

In the section on General Information, you must specifically exclude from the list of ants the following ants: harvester ants, pharaoh ants and carpenter ants.

On page 4, revise the second #3 instruction to limit use outdoors to "use outdoors adjacent to the home."

Include on the master label the number of bait stations and the net weight of the package as marketed.

Delete the following comparative claim:  
Works when other baits don't.

Clarify that the following claims do not include fire ants:

Lasts for 1-12 months

Long lasting power

Non-stop ant control

Provides long lasting ant killing power

Controls ant problem

Delete the following implied safety claims:

Appealing -or- attractive blend of foods -or- bait flavor.

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

Sincerely,

*for Ann Sibold*

Richard Gebken

Product Manager 10

Insecticide Branch

Registration Division (7505P)

3/9

Note: *Bold, Italicized text is information for the reader and is not part of the label.*

[Bracketed information is optional text.]

Underlined text is new.

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Combat Ant Bait F1

Pg 1 of 7

# COMBAT

## ANT BAIT F1

[*Alternate Brand Name* = **QUICK KILL FORMULA3**]

FOR INDOOR AND OUTDOOR (adjacent to the home) USE.

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

### CAUTION:

SEE PRECAUTIONARY STATEMENTS ON BACK – OR – SIDE PANEL

ACTIVE INGREDIENTS: Fipronil\*.....0.01%

OTHER INGREDIENTS:.....99.99%

\*CAS No. 120068-37-3

EPA Reg. No. 64240-30

EPA Est. No. \_\_\_\_\_

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

NOV 24 2006

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

64240-30

DISTRIBUTED BY ©2007  
COMBAT INSECT CONTROL SYSTEMS  
SCOTTSDALE, ARIZONA 85254  
MADE IN U.S.A.

(CONTAINS) \_\_\_\_\_ CHILD-RESISTANT BAIT STATIONS (AND STAKES)

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## PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**CAUTION:** Wash [hands] thoroughly with soap and water after handling bait stations.

**FIRST AID:** If swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. **Questions? 1-800-426-6228.**

**STORAGE AND DISPOSAL:** [Do not contaminate water, food or feed by storage or disposal.] [Do not remove baits from [bait] station[s].]

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

**DISPOSAL:** If empty: Do not reuse this container. Place in trash [or offer for recycling if available]. If partly filled: Call you local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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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

### [THIS IS] HOW [THE] COMBAT® ANT BAIT F1 [QUICK KILL FORMULA3] WORKS:

- [Worker] Ants enter bait station and eat the bait –or- leave after eating –or- feeding on bait inside

– or –

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

- Ants carry bait back to colony so that the bait can kill the 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.

– or –

Ants take the bait back to the nest.

- Ants pass the bait on to the queen and destroy the entire colony.

- This product contains a ~~totally-unique~~ an effective 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 (the colony) 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.

– or –

- Kills common household ants, including Argentine, Pharaoh, Cornfield, Odorous House and Pavement Ants.

## GUARANTEED TO WORK

OR YOUR MONEY BACK! Call the COMBAT® HELPLINE at 1-800-426-6228 for information.

*The label may include illustrations of suggested bait station placement sites.*

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**DIRECTIONS FOR USE (continued):**

**APPLICATION INSTRUCTIONS**

1. Use [all] [package count] [several] bait[s] [stations at the same time for thorough control]. [Large or heavily infested areas may require more bait stations.] Break bait[s] [station[s] apart [from plastic frame]. [Simply] [Place [each] bait[s] [station[s] [by] near ant trails – *or* – [close to areas] [where ants are numerous] – *or* – [or where you frequently see ants.] [Place additional bait[s] [stations] [near cracks, along sills or] anywhere [that] ants might – *or* – may enter your home.]
2. [Do not spray insecticide on or around the bait stations. Spray[s] [will] contaminate [the] baits and reduce [their] effectiveness.]
3. Replace [all] [package count] bait[s] [stations] every [after] 3 months [of] [indoor] [use] to keep ants from reappearing – *or* – returning.

– *or* –

1. [To activate] [remove cellophane wrapper.] [Tear along perforation lines.] [Do not remove or puncture label[s] on bait stations.] [Now the baits are ready to use.] [Do not remove or puncture white label on bait stations.]

[Inside, COMBAT can be placed in cabinets, next to dishes, or anywhere your ant problem occurs.]

[For general control of ants outdoors (adjacent to your home) 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.]

[Outside (adjacent to) your home, place additional COMBAT bait stations near cracks and crevices, along sills, or anywhere ants may gain entry.]

[Place the stations adjacent to your home: 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 – *or* – Hammer the stake 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.]

[Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within a day – *or* – a few days – *or* – a week. [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 so that it can kill – *or* – destroy the queen and the other ants – *or* – the entire colony.]

2. [Do not spray the bait stations.]
3. [For continuous control of ants,] Replace [all] [package count] baits[s] after 6 weeks [of use outdoors] – *or* – [to keep ants from returning.]

The "Date placed, Location and Replacement Date" item is deleted.

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*Claims for front or back:*

- With [a blend of] [multiple] foods ants eat
- With foods ants find attractive [appealing]
- Appealing – *or* – Attractive blend of foods – *or* – bait flavor
- With multiple foods to kill [the] queen and [the] [entire] colony
- Destroys – *or* – Kills [the] queen and [the] [entire] colony [source]
- Quick kill formula
- Fast formula
- Kills the ants you see and ones you don't see
- Long lasting power
- Non-stop ant control
- Provides long lasting ant killing power
- 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]
- Kills ants without messy residue and without insecticide odors – *or* – fumes
- For common household ants
- Kills grease and sugar loving ants
- Ants carry bait back to the colony so that the bait can kill the queen and other ants so that they don't invade your home
- Kills ants outdoors (adjacent to the home) before they come indoors so that they don't invade your home
- Kills entire colony
- Child-resistant
- Attracts worker ants to the bait stations
- *Leaves no residue or odor*

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***Claims for front or back (continued):***

- Kills ants without insecticide odors [fumes]
- Kills ants at their source
- Controls ant problem
- Starts [working] as soon as you activate
- Works when other baits don't
- Lasts for [1-12] months
- Kills ants quickly
- No vapor, fumes or odor [easy to use] [nothing to activate]
- Easy to use
- Nothing to activate
- Destroys or kills [the] queen and [the] [entire] colony [source]

**For 6 count or more:**

- Great value
- Value size
- Economy size

***For 20 count only:***

For use in commercial establishments



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## UNIT LABEL

*Actual size of unit label is approximately 2.125 in. × 2.125 in.*

# COMBAT ANT BAIT F1

**THIS SIDE DOWN OR AGAINST SURFACE**

**Note:** Do not remove or puncture this label

**ACTIVE INGREDIENT:** Fipronil\*.....0.01%

**OTHER INGREDIENTS:** .....99.99%

\*CAS No. 120068-37-3

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

### CAUTION:

Wash [hands] thoroughly with soap and water after handling [bait stations].

[Do not contaminate water, food or feed by storage or disposal.]

**DISPOSAL:** If empty: Do not reuse this container. Place in trash [or offer for recycling if available]. If **partly filled**: Call you local solid waste agency or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[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.

Distributed by ©2007  
Combat Insect Control Systems  
Scottsdale, AZ 85254

EPA Reg. No. 64240-30  
EPA Est. No. \_\_\_\_\_

SEE OUTER CARTON – *or* – BAG – *or* – CONTAINER FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight 0.035 oz (1.0g) – *or* – 0.05 oz (1.4g)