

64240-30

8-9-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

AUG 9 2007

Mr. Robert S. Brinnis  
Product Registration  
Combat Insect Control Systems  
15101 N. Scottsdale Rd.  
Scottsdale, AZ 85254

SUBJECT: Application for Pesticide Notification (PRN 98-10)  
Request Minor Label Change  
EPA Reg. No. 64240-30  
Application Dated July 19, 2007

Dear Mr. Brinnis:


The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 07/19/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other - Notification	OPP Identifier Number
<b>Application for Pesticide - Section I</b>			
1. Company/Product Number 64240-30		2. EPA Product Manager Richard Gebken	
4. Company/Product (Name) Combat Ant Bait F1		3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems 15101 N. Scottsdale Rd. Scottsdale, AZ 85254 <b><u>PLEASE SEND ALL CORRESPONDENCE TO</u></b> <b><u>"CONTACT POINT" LISTED BELOW</u></b> <input type="checkbox"/> Check if this is a new address		6. <b>Expedited Review.</b> 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 _____	
<b>Section - II</b>			
<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 type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below			
<b>Explanation:</b> This is a simple notification to add the word Ant under our graphic so customers know what the target pest is. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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.			
<b>Section - III</b>			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <b>*Certification must be submitted</b>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt.      No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt.      No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container		5. Location of Label Directions <input checked="" 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 checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
<b>Section - IV</b>			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Robert S. Brennis, Lewis & Harrison 122 C St. NW, Suite 740, Washington, DC 20001		Title Agent for Combat Insect Control Systems Telephone No. (Include Area Code) 202-393-3903 ext. 20	
Certification 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. Date Application Received  <div style="border: 1px solid black; width: 100px; height: 50px; margin: 0 auto; text-align: center; line-height: 50px;">           (Stamped)         </div>
2. Signature 		3. Title Agent for Combat Insect Control Systems	
4. Typed Name Robert S. Brennis		5. Date July 19, 2007	

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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

July 19, 2007

Richard Gebken, PM Team 10  
U.S. Environmental Protection Agency  
Office of Pesticide Programs (7504C)  
Document Control Desk (Notif)  
1801 Bell Street S.  
Arlington, VA 22002

**Combat Insect Control Systems**  
**Combat® Ant Bait F1, EPA Appl. No. 64240-30**  
**Notification**

Dear Mr. Gebken:

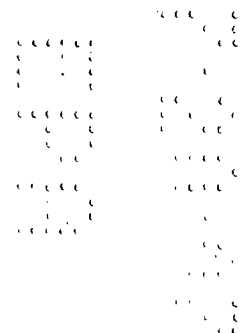
This is a simple notification to add the word Ant under our graphic so customers know what the target pest is. We are also adding some simple marketing claims because we are including more baits in the package we are selling and not increasing the price. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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.

If you have any questions about the enclosed registration submission, please contact me either by telephone at 202-393-3903 ext. 20 or by e-mail at [rbrennis@lewisharrison.com](mailto:rbrennis@lewisharrison.com).

Sincerely,



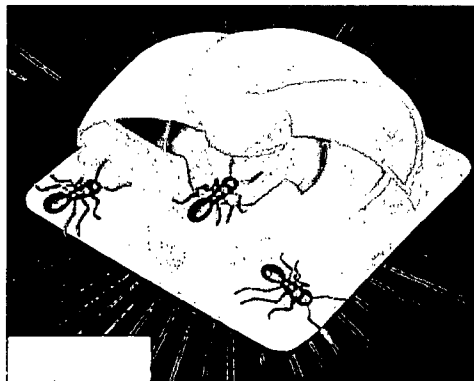
Robert S. Brennis  
Agent for Dial Corporation



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.

4/11  
Master Label, July 2007  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 1 of 8

## COMBAT<sup>®</sup> Ant Bait F1



FOR INDOOR AND OUTDOOR (adjacent to the home) USE

**[ANT]**

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. 071106-GA-001

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

[Contains] [2] [4] [6] [8] [12] [18]  
CHILD-RESISTANT BAIT STATIONS [AND STAKES]

[TOTAL] NET WT [0.07oz (2g)] [0.14oz (4g)] [0.21oz (6g)] [0.28oz (8g)]  
[0.42 oz. (12g)] [0.63 oz. (18g)]

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

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5/11  
Master Label, July 2007

EPA Reg. No. 64240-30

Combat Ant Bait F1

Pg 2 of 8

## 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 your local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note: ***Bold, italicized text is information for the reader and is not part of the label.***  
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Master Label, July 2007  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 3 of 8

## 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 FORMULA 3] 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.

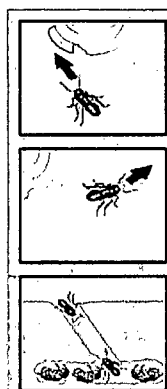
***-or-***

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 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 the 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, Cornfield Ants, Little Black, Odorous House, and Pavement Ants.
- or-***
- Kills common household ants, including Argentine, Cornfield, Odorous House and Pavement Ants.

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

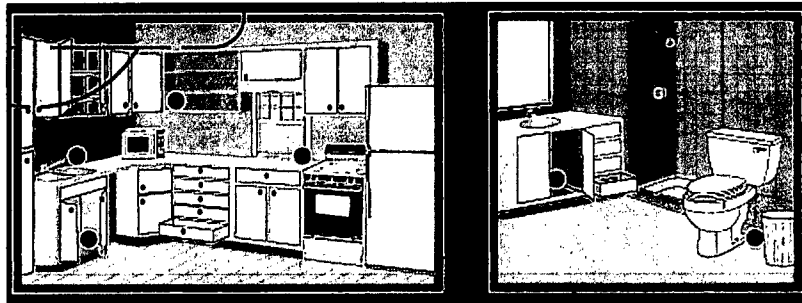
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7/11  
Master Label, July 2007  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 4 of 8

***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* –

## DIRECTIONS FOR USE – APPLICATION INSTRUCTIONS, Continued

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.]

[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*] bait[s] after 6 weeks [of use outdoors adjacent to home] – ***or*** – [to keep ants from returning.]



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***Claims for front or back:***

- With [a blend of] [multiple] foods ants eat
- With foods ants find attractive [appealing]
- 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: Argentine Ants, [, Little Black Ants, Cornfield Ants, Odorous House Ants, Pavement 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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10/11  
Master Label, July 2007  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 7 of 8

***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
- 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
- [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*)

**For 20 count only:**

For use in commercial establishments

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Master Label, July 2007  
EPA Reg. No. 64240-30  
Combat Ant Bait F1  
Pg 8 of 8

UNIT LABEL

# COMBAT® Ant Bait F1

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label

ACTIVE INGREDIENTS: 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, Arizona 85254  
Made in U.S.A.

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)