

64240-39

9/30/2010

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

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

September 30, 2010

Ms. Georgia Anastasiou,  
Agent for  
Combat Insect Control Systems  
122 C Street, N.W., Suite 740  
Washington, DC 20001

Subject: **Notification to "Revise labeling per PR Notice 2007-4"**  
Combat Ant Bait F3 (EPA Registration Number: 64240-37)  
Combat ABF5 (EPA Registration Number: 64240-39)  
Date of Application: August 09, 2010

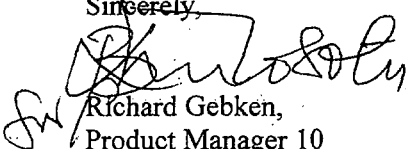
Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PR) Notice 98-10 dated August 09, 2010, for the subject products. The Registration Division (RD), after conducting a review of your requests for its applicability, finds that the actions requested fall within the scope of PR Notice 98-10.

Please note that we have approved the amended labeling for these two products with the understanding that it is consistent with the Agency's previously stamped accepted labels; and other than the above stated, no other changes have been made to the labeling and/or the Confidential Statement of Formula (CSF).

The labels submitted with the applications have been stamped "Notification" and will be placed in our records. If you have any questions regarding this letter, please contact Dr. B. A. Akinlosotu at (703) 605-0653.

Sincerely,

  
Richard Gebken,  
Product Manager 10  
Insecticide Branch  
Registration Division (7505P)



EPA

United States  
Environmental Protection Agency  
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number <b>64240-39</b>	2. EPA Product Manager <b>Richard Gebken</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>Combat ABF5</b>	PM# <b>10</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. <u><b>NOTIFICATION</b></u> Product Name <u><b>SEP 30 2010</b></u>	

Section - II

- Amendment - Explain below.
- Resubmission in response to Agency letter dated \_\_\_\_\_
- Notification - Explain below.
- Final printed labels in response to Agency letter dated \_\_\_\_\_
- "Me Too" Application
- 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					
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. Date 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>	

# 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:**            **Richard Gebken**  
                                 **Product Manager #10**

**SUBJECT:**                **Combat Insect Control Systems**  
                                 **Notification per PR Notice 2007-4 for the following products**  
                                 **Combat Ant Bait F3 (EPA Reg. No. 64240-37)**  
                                 **Combat ABF5 (EPA Reg. No. 64240-39)**

Dear Mr. Gebken:

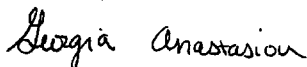
On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

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.

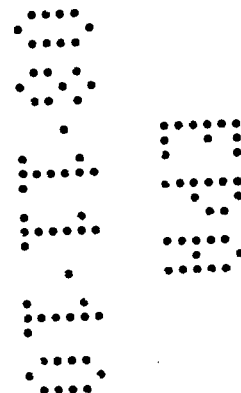
If you have any questions and/or comments about the enclosed submission, please feel free contact me by phone at 202-393-3903 (ext. 19) or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com).

Sincerely,



Georgia Anastasiou  
Agent for,  
Combat Insect Control Systems

cc:     David Rickard (Combat)



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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:**

Master Label, August 2010  
EPA Reg. No. 64240-39  
Combat ABF5

**NOTIFICATION**  
**SEP 30 2010**

**COMBAT®**  
**ABF5**

Destroys Queen and Colony

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

**CAUTION:**

SEE PRECAUTIONARY STATEMENTS ON BACK – OR – SIDE PANEL

ACTIVE INGREDIENTS: Fipronil\*.....0.0005%

OTHER INGREDIENTS: .....99.9995%

\*CAS No. 120068-37-3

EPA Reg. No. 64240-39

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

Contains 1 Liquid Bait STATION

Net Contents (Weight): 0.0372 fl oz (11 ml)

GUARANTEED TO WORK [or your money back]

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

DISTRIBUTED BY & ©2010

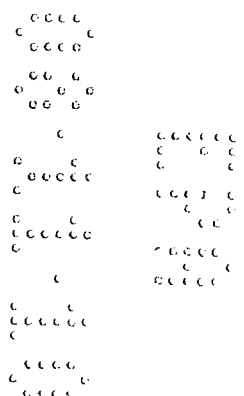
Combat Insect Control Systems

19001 N. Scottsdale Rd. Scottsdale, AZ 85255

MADE IN U.S.A.



[[The paperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_%  
Recycled fiber [minimum \_\_\_\_\_% post consumer content].]  
[Please Recycle Empty Carton.]



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Master Label, August 2010  
EPA Reg. No. 64240-39  
Combat ABF5

**DIRECTIONS FOR USE**

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

Open cap and remove film. Place bait station near ant trail or where you frequently see ants or where ants may enter your home; near crack, crevices along sills.

For best results do not interfere with the ants or bait stations during use.

Replace station if ants return.

Do not use sprays on or around the product -or- station. Do not remove or puncture label on bait station.

**THIS IS HOW THIS PRODUCT WORKS:**

- 1. Ants enter bait station and 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.

- 2. 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.

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

**PRECAUTIONARY STATEMENTS  
Hazards to Humans and Domestic Animals**

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

**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:** 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.

**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.*

**EFFECTIVENESS GUARANTEE:** 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

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

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Master Label, August 2010

EPA Reg. No. 64240-39

Combat ABF5

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

- Starts to kill – or – kills ants in 1 day
- Starts to kill – or – kills ants overnight
- See results overnight
- Overnight results
- Kills ants in – or – within hours
- Fast kill in 1 day
- Kills ants quickly
- Quick kill formula
- Fast formula
- Eliminates -or- stops -or- kills -or- destroys the [entire] [ant] colony -or- nest [so they don't invade your home]
- Eliminates -or- stops -or- kills -or- common household -or- pest –or- outdoor ants (adjacent to the home) -or- ants outdoors before they come indoors.
- You should see dead ants overnight
- Starts killing ants in hours
- Overnight killing action
- Fast kill in one -or- 1 day
- [Fast control] with Firponil
- More effective control\*
- Improved -or- more effective formula\*
- Improved multi -or- all -or- four season formula -or- performances\*
- Works better than ever\*
- Kills more than ever\*
- Ant stay away longer\*
- Works overnight -or- in hours
- Stops ants from invading your food -or- house
- Ants gone -or- [virtually] disappear overnight -or- in hours -or- in 1 day -or- 24 hours -or- in days
- Improved any food source -or- [ant] feeding
- Liquid [based] formula [preferred by ants] [vs solid baits -or- \*

***Secondary Kill Claims for front or back:***

- Kills -or- stops -or- eliminates [the] queen and [the] [entire] colony
- Kills -or- stops -or- eliminates the ant source -or- the ants you see and ones you don't see -or- entire [ant] colony
- Kills -or- Destroys the [queen and] (ant) colony -or- nest
- Ants carry Combat -or- bait -or- ingredients back to the colony to stop -or- kill the queen [and other ants][so they don't invade your home -or- kitchen]
- Stops ants where they live -or- nest
- Protects your family from ant invasions
- [Worker] ants take it -or- Combat's Ingredients back to the nest -or- queen.
- This product is effective because ants carry bait back [to where they live] -or- [to the nest] -or- [to the colony] to destroy -or- stop -or- kill [the] queen [and entire colony].

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Master Label, August 2010  
EPA Reg. No. 64240-39  
Combat ABF5

***Duration/Prevention Claims for front or back:***

- Kills ants continuously
- Kills non-stop
- Ongoing -or- non-stop any control
- Kills quickly and keeps on killing [back at the nest]
- Provides long lasting ant control
- Longer term control\*
- Keeps ants away [for week or months]

***Attributes for front or back:***

- Kills -or- eliminates -or- stops ants [without messy residue and] without insecticide odor [or fumes]
- Works [without messy residue and] without insecticide odors [or fumes]
- [This product] kills -or- for common household ants, [including -or- such as: Pharaoh Ants, Argentine Ants, [Black Carpenter Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Pavement Ants]
- Effective Against: Pharaoh Ants, Argentine Ants, Carpenter Ants, Pavement Ants, Cornfield Ants, Odorous House Ants, Acrobat Ants, Thief Ants, Crazy Ants
- Leaves no residue or odor
- Kills -or- stops -or- eliminates indoor and outdoor ants (adjacent to the home)
- Kills -or- stops -or- control ants outdoors (adjacent to the home) before they come indoors [so that they don't invade your home]
- This product contains a [totally] unique ingredient which kills -or- stops [most] ants commonly found in household -or- homes
- If even kills ants [you don't see] [outside (adjacent to) your home] [to prevent more ants from coming inside]
- [This [product] is] easy to use [and has no insecticide odor]
- Easy-to-use
- Odorless
- No Insecticide Odor
- Attracts Worker Ants to the Bait Stations
- No Insecticide Odor -or- vapor -or- fumes -or- mess
- Ant prefer liquid(s) to solid(s) bait -or- food
- Preferred by ants to the food in your cabinets
- What ants are looking for

(\*) vs Combat Ant Bait (because ants prefer liquid(s) to sold(s) [bait -or- food])

[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.

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Master Label, August 2010

EPA Reg. No. 64240-39

Combat ABF5

Pg 5 of 5

*UNIT LABEL*

**COMBAT®  
ABF5**

Note: Do not remove or puncture this label

ACTIVE INGREDIENTS: Fipronil\* .....0.0005%

OTHER INGREDIENTS: .....99.9995%

\*CAS No. 120068-37-3

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

**CAUTION:**

Wash thoroughly with soap and water after handling.

**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.

For Questions or Comments about Combat 1-800-426-6228

Distributed by ©2010  
Combat Insect Control Systems  
19001 N. Scottsdale Rd. Scottsdale, AZ 85255

EPA Reg. No. 64240-39  
EPA Est. No. \_\_\_\_\_

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight 0.0372 oz (11ml)