

64240-42

10/10/2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 10 2008

Ms. Ana Rodriguez-Koster
Agent for Combat Insect Control Systems
Lewis & Harrison, LLC
122 C Street, N.W. Suite # 740
Washington, DC 20001

RE: Notification to delete six Alternate Brand Names
EPA Registration Number: 64240-42
Date of Submission: August 26, 2008

Dear Ms. Rodriguez-Koster:

This letter is to acknowledge your request to the Agency in a letter dated August 26, 2008 to delete six alternate brand names: "Combat Platinum Ant Killing Gel," "Combat Platinum Brand Ant Killing Gel," "Combat Quick Kill Ant Killing Gel," "Combat Quick Defense Ant Killing Gel," "Combat Precision Ant Killing Gel," and "Combat Precision Kill Ant Killing Gel." Our records have been updated to reflect this change.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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

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

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EPA

United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other - Notification

OPP Identifier Number
265394

Application for Pesticide - Section I

1. Company/Product Number 64240-42	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat ABF7	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Henkel Consumer Goods Inc. 15101 N. Scottsdale Road Scottsdale, AZ 85254-2199 <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: NOTIFICATION EPA Reg. No. _____ Product Name _____ OCT 10 2008

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 PER PR NOTICE 98-10 TO DELETE SIX ALTERNATE BRAND NAMES. SEE COVER LETTER FOR DETAILS.

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 EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 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.

Signature: Ana Rodriguez-Koster Date: 8/26/08

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
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
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"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Ana Rodriguez-Koster - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-3903 ext. 17
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 <u>Ana Rodriguez-Koster</u>	3. Title Agent for Combat Insect Control System	
4. Typed Name Ana Rodriguez-Koster	5. Date 8/26/2008	

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

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August 26, 2008

HAND DELIVERED

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

ATTENTION: Richard Gebken
Product Manager, Team 10

SUBJECT: Combat Insect Control Systems
Combat ABF7 (EPA Reg. No. 64240-42)
Notification per PR Notice 98-10 to Delete Six Alternate Brand Names

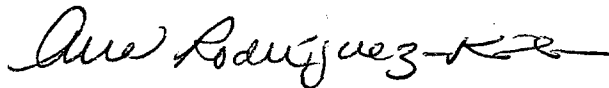
Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), I am submitting this Notification to delete six Alternate Brand Names that were recently submitted to the Agency for the product, **Combat ABF7 (EPA Reg. No. 64240-42)**. The six Alternate Brand Names that Combat wants to delete from the product's registration are the following: "Combat Platinum Ant Killing Gel," "Combat Platinum Brand Ant Killing Gel," "Combat Quick Kill Ant Killing Gel," "Combat Quick Defense Ant Killing Gel," "Combat Precision Ant Killing Gel," and "Combat Precision Kill Ant Killing Gel."

In support of this submission, enclosed please find an Application for Pesticide Notification (which includes a signed statement certifying compliance with PR Notice 98-10) and a revised Master Label that no longer includes these Alternate Brand Names.

Thank you for your assistance with this submission. If you have any questions, please call me at 202-393-3903 ext. 17 or e-mail me at alkoster@lewisharrison.com

Sincerely,



Ana Rodriguez-Koster
Agent for Combat Insect Control Systems

cc: David Rickard, Combat Insect Control Systems

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.

Master Label, August 2008

EPA Reg. No. 64240-42

Combat ABF7

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COMBAT® ABF7
[Alternate Brand Names:]
COMBAT ANT KILLING GEL

Only when co-packed with EPA Reg. No. 64240-33 and 64240-54 will the following Alternate Brand Names be used:

COMBAT PLUS

ACTIVE INGREDIENT: Fipronil†.....0.001%

OTHER INGREDIENTS:99.999%

†CAS No. 120068-37-3

NOTIFICATION

OCT 10 2008

CAUTION:

KEEP OUT OF REACH OF CHILDREN

USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS

Avoid contact with textiles and clothing as bait may stain. – or – Product may stain textiles and clothing.

SEE PRECAUTIONS ON END -or- SIDE -or- BACK -or- BOTTOM PANEL.

Distributed by & ©2008 Combat Insect Control Systems
15101 N. Scottsdale Rd., Scottsdale, AZ 85254

EPA Reg. No. 64240-42

EPA Est. No. _____

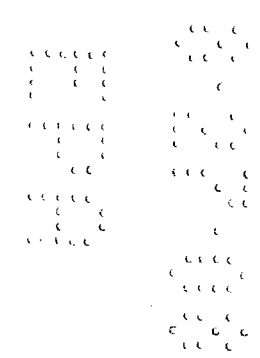
Combat GUARANTEED to work [OR YOUR MONEY BACK]

Contains 1 reservoir -or- syringe

TOTAL NET WT 0.95 oz (27g)

The label may include illustrations of suggested application placement sites.

[U.S. PATENT NOS. _____]



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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.]

Underlined text is new.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

FIRST AID: Call poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. [Have the product container or label with you when calling a poison control center or doctor or going for treatment.]

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. [Call 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.

[HOT LINE NUMBER:] Combat [information] Helpline: **1-800-426-6228**

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry area – or – below 80°F – or - 100°F out of reach of children.

DISPOSAL: If empty: Do not reuse this container. Recap syringe[s] – or – reservoir[s] and place in trash. **If partly filled:** Recap syringe[s] – or – reservoir[s] and 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.



[[The paperboard in this] [C]carton [contains] [is made from] _____ %

Recycled fiber [minimum _____ % post consumer content].]

[PLEASE RECYCLE EMPTY CARTON]

GENERAL INFORMATION

DIRECTIONS FOR USE

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

This product provides FAST CONTROL of [Carpenter] Ants in 3-5 days.

This product is formulated to effectively control [Carpenter] Ants. That's because this product contains Fipronil, a fast-acting active ingredient. Its speed is still slow enough, however, for foraging ants to return to the colony and feed the bait to larvae and queen[s] so that the entire colony is killed through the Domino Effect™.

[When exposed to higher temperatures (above 80°F) for extended periods of time, the gel will change color and lose effectiveness. If the gel inside the tube is darker than the color bar below, do not apply.]

[FOR CONSUMER USE ONLY]

[SPANISH INSTRUCTIONS INSIDE BOX]

APPLICATION INSTRUCTIONS

[This package [insert] should be in possession of applicator.] Application rate is dependant on level of infestation and species to be controlled. Bait should be applied as spots.

Keep exposed gel away from open foods and food contact surfaces.

1. Inspect for ants: Place gel in areas of suspected ant activity, next to ant trails and near ant nests. Avoid applying gel in direct sunlight. Gel can be placed in cracks, crevices, corners, and areas such as under and behind kitchen appliances, along baseboards, under sinks, in pantry, around pipes and water heater and in the garage and attic.

-or-

1. To apply gel: Remove cap from tip *-or-* break tip off, touch tip to surface and depress plunger. Recap tube after use.
2. Apply gel in spots in cracks and crevices. For best results, make – or – place many spots or dabs of gel where you see ants foraging and entering the structure.
3. Do not apply gel to areas which have been recently sprayed with insecticide or contaminated with foggers, and do not spray insecticide over gel as this may cause the bait to become repellent.
4. Inspect placements and reapply as needed.

[Tips for Best Results:

- Do not spray insecticides or smoke around gel bait
- Clean greasy or dirty surfaces before placement
- In more open areas, such as walls and floors, inside cabinets, and near food, also use Combat Quick Kill Formula 3 baits for maximum ant control
- Do not use strong cleaners around bait placements]

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[For indoor use: Visually inspect for ants and place gel in areas where you see ants. Do not place bait in locations that are routinely – or – frequently washed, as bait will be removed by washing. Do not treat food preparation surfaces. Do not use this product in or on electrical equipment where a possibility of shock hazard exists.]

[For outdoor use: Place gel into or on adjacent to structures where you see ants, next to ant trails and suspected areas of ant activity.]

[You will notice fewer ants in days] [Pest population reduction will be apparent within a week]

[Keep [exposed] [applied] gel away from open food and food contact surfaces. Do not treat food/feed preparation surfaces.]

[Gel placements should be near ant trails, next to ant nests or in areas of suspected ant activity.]

[This product's gel may be used as a spot or crack and crevice treatment for the indoor and outdoor control of ants.]

For questions or comments about COMBAT, call 1-800-426-6228.

Claims for front or back

- Fast killing formula
- First specially formulated [Carpenter] Ant gel
- Elimination [Control] within 3-5- days
- Kills [Carpenter] Ants and the colony
- Gain control of your [Carpenter] Ant problem
- Works within hours and up to 1 month
- Unique [Carpenter] Ant formula
- Visible results overnight
- Starts killing [Carpenter] [Ants] in hours
- Fast acting formula that quickly kills [Carpenter] Ants
- Provides control of [Carpenter] Ants
- Preferred food form for [Carpenter] Ants
- Kills [Carpenter] Ants in the colony
- Effective against Carpenter, Pharaoh, Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, Little Black Ants
- Satisfaction or Quality guaranteed
- Kills [Carpenter] Ants at the source
- With Fipronil
- [Store below 80°F – or - 100°F]

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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UNIT (Syringe) LABEL
[Not shown actual size]

COMBAT[®] ABF7
[Alternate Brand Names:
COMBAT ANT KILLING GEL

Only when co-packed with EPA Reg. No. 64240-33 and 64240-54 will the following Alternate Brand Names be used:

COMBAT PLUS

Note: Do not remove this label.

ACTIVE INGREDIENT: Fipronil†.....0.001%
OTHER INGREDIENTS:99.999%
†CAS No. 120068-37-3

KEEP OUT OF REACH OF CHILDREN
USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

FIRST AID: Call poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. [Have the product container or label with you when calling a poison control center or doctor or going for treatment.]

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. [Call 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.

[HOT LINE NUMBER:] Combat [information] Helpline: 1-800-426-6228

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Master Label, August 2008

EPA Reg. No. 64240-42

Combat ABF7

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STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a cool, dry area – or – below 80°F – or - 100°F out of reach of children.

DISPOSAL: If empty: Do not reuse this container. Recap syringe[s] – or – reservoir[s] and place in trash.

If partly filled: Recap syringe[s] – or – reservoir[s] and 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.

[If the gel inside the tube is darker than this color ____, do not apply.]

Product may stain textiles and clothing.

[For] Questions or [C]omments [?] [about Combat,] call toll free 1-800-426-6228.

Distributed by & ©2008 Combat Insect Control Systems

EPA Reg. No. 64240-42

15101 N. Scottsdale Rd., Scottsdale, AZ 85254

EPA Est. No. _____

[U.S. Patent Nos. _____]

SEE OUTER CARTON [INSERT] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT _____