



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MAY 21 2009

Ms. Georgia Anastasiou  
Lewis & Harrison, LLC  
122 C St. NW #740  
Washington, DC 20001

RE: Notification of Alternate Brand Names: **Combat Source Kill Max Ant Killing Gel**  
**Combat Quick Kill Formula 3 Ant Killing Gel**  
**Combat Platinum Brand Ant Killing Gel**

EPA Registration Number: 64240-42

Date of Submission: April 6, 2009

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 6, 2009, for the product, Combat ABF7. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions 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 Joyce Edwards of my staff at 703-308-5479.

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



# LEWIS & HARRISON

122 C Street, N.W., Suite 740  
Washington, D.C. 20001  
telephone 202.393.3903  
fax 202.393.3906

Consultants In Government Affairs

April 6, 2009

**HAND DELIVERED**

Document Processing Desk [NOTIF]  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

**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: Alternate Brand Name**

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems ("Combat"), we are submitting a notification to propose the following alternate brand names for the product Combat ABF7 (EPA Reg. No. 64240-42):

- Combat Source Kill Max Ant Killing Gel**
- Combat Quick Kill Formula 3 Ant Killing Gel**
- Combat Platinum Brand Ant Killing Gel**

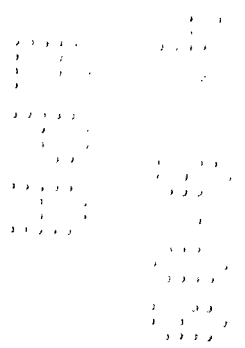
Please note that Jim Roelofs from the OPP Labeling Committee stated the word "Max" is acceptable as part of the brand name. In addition, as noted in the attached EPA letter dated 11/21/06, the words "Platinum Brand" can be used as part of the alternate brand name.

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 one copy of the label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at [georgia@lewisharrison.com](mailto:georgia@lewisharrison.com). I thank you in advance for your cooperation.

Sincerely,  
*Georgia Anastasiou*  
Georgia Anastasiou  
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, July 2008  
EPA Reg. No. 64240-42  
Combat ABF7  
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# COMBAT® ABF7

*Alternate Brand Names:*

**Current:** [Combat Ant Killing Gel]

**Proposed:** [Combat Source Kill Max Ant Killing Gel]

**Proposed:** [Combat Quick Kill Formula 3 Ant Killing Gel]

**Proposed:** [Combat Platinum Brand Ant Killing Gel]

**NOTIFICATION**

MAY 21 2009

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

## CAUTION:

### KEEP OUT OF REACH OF CHILDREN

USE ONLY IN AREAS NOT EASILY ACCESSIBLE 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 & ©2009 Combat Insect Control Systems  
19001 N. Scottsdale Rd., Scottsdale, AZ 85255

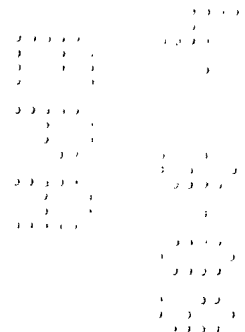
EPA Reg. No. 64240-42  
EPA Est. No. \_\_\_\_\_

Combat GUARANTEED to work  
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. \_\_\_\_\_]





## 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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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.

**[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.]

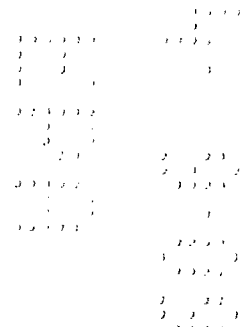
[You will notice fewer ants in days] [Pest population reduction will be apparent within a week]  
[Keep [exposed] *-or-* [applied] gel away from open food and food contact surfaces. Do not treat food/feed preparation surfaces.]

[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]



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[Bracketed information is optional text.]

Underlined text is new.

Master Label, July 2008

EPA Reg. No. 64240-42

Combat ABF7

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*UNIT (Syringe) LABEL [Not shown actual size]*

# COMBAT® ABF7

## NOTIFICATION

MAY 21 2009

**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 the 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 a 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 a 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.

[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

19001 N. Scottsdale Rd., Scottsdale, AZ 85255

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

[U.S. Patent Nos. \_\_\_\_\_]

**SEE CARTON [INSERT] FOR COMPLETE DIRECTIONS AND PRECAUTIONS**

NET WT \_\_\_\_\_