

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAY 2 1 2009

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

RE: Notification of Alternate Brand Names: Combat Source Kill Max Ant Killing Gel

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,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

Office of Pesticide Programs

Please read instructions on reverse before completing form. Form Approved, OMB No. 2070-0060, Approval expires 05-31-98 United States **OPP Identifier Number** ☐ Registration **Environmental Protection Agency** ☐ Amendment Washington, DC 20460 ○ Other Application for Pesticide - Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification 64240-42 Richard Gebken Restricted None 4. Company/Product (Name) PM# Combat ABF7 10 5. Name and Address of Applicant (Include ZIP Code) 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) **Combat Insect Control Systems** (b)(l), my product is similar or identical in composition and labeling 15501 N. Scottsdale Road Scottsdale, AZ 85260 EPA Reg. No.__ NOTIFICATION NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW Product Name Check if this is a new address Section - II Amendment - Explain below. Final printed labels in response to Agency letter dated _ Resubmission in response to Agency letter dated "Me Too" Application Notification - Explain below. Other - Explain below **Explanation**: Use additional page(s) if necessary. (For Section I and Section II.) **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 PLEASE READ COVER LETTER FOR DETAILS. Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 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 the 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 Water Soluble Packaging Unit Packaging Yes* Yes Yes Metal No Plastic No No No. per No. per If "Yes" Glass Unit Packaging wgt. container Package wgt. container *Certification must Paper be submitted Other (Specify) 3. Location of Net Contents Information 4. Size(s) Retail Container Location of Label Directions Label Container On Label On labeling accompanying product Other 6. Manner in Which Label is Affixed to Product Lithograph Paper glued Stenciled Section - IV 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application) Telephone No. (Include Area Code) Title Name Georgia Anastasiou - Lewis & Harrison, LLC, 122 C St. NW #740, Washington DC 20001 Agent for Combat Insect Control Systems 202-393-3903 ext. 19 Certification Date Application I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I Received acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both (Stamped) under applicable law 2. Signature Agent for Combat Insect Control System Seogra anestasion 5. Date 4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC April 6, 2009



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. I thank you in advance for your cooperation.

Sincerely,

Stogia Anastasion Georgia Anastasiou

Agent for,

Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

COMBAT® ABF7

Alternate Brand Names:

NOTIFICATION

Current: [Combat Ant Killing Gel]

MAY 2 1 2009

Proposed: [Combat Source Kill Max Ant Killing Gel]
Proposed: [Combat Quick Kill Formula 3 Ant Killing Gel]
Proposed: [Combat Platinum Brand Ant Killing Gel]

0.001%
99.999%
N AND PETS
oduct may stain textiles and
OTTOM PANEL.
EPA Reg. No. 64240-42
EPA Est. No.
lication placement sites.

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 is 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.

③		
[[The paperboard in this] [C]car	ton [contains] [is made from]	%
Recycled fiber [minimum	_% post consumer content].]	

Master Label, July 2008

EPA Reg. No. 64240-42

Combat ABF7

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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 EffectTM.

[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 repellant.
- 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] -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]

Underlined text is new.

UNIT (Syringe) LABEL [Not shown actual size]

COMBAT® ABF7

NOTIFICATION

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Note: Do not remove this label.	MAY	2 1	2009
ACTIVE INGREDIENT: Fipronil†9 THER INGREDIENTS:9 †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 is contact with skin, eyes, and clothing. Prolonged or frequently repeated skin contact materiactions 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 FIRST AID: Call a poison control center or doctor for treatment advice. IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediate water for 15-20 minutes. [Have the product container or label with you when calling a poor doctor or going for treatment.] IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. lenses, if present, after the first 5 minutes, then continue rinsing eye. [Call a poison control for treatment advice.] Have the product container or label with you when calling a poiso 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 dis STORAGE: Store is 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] a partly filled: Recap syringe[s] -or- reservoir[s] and call your local solid waste agency or 300-CLEANUP for disposal instructions. Never place unused product down any indoor and product may stain textiles and clothing.	exists. ely with ploison cont Remove of the control of the contr	enty rol c conta or do cente	of center act octor er or
For] Questions or [C]comments [?] [about Combat,] call toll free 1-800-426-6228. Distributed by & ©2008 Combat Insect Control Systems EPA Reg. No. 6424 19001 N. Scottsdale Rd., Scottsdale, AZ 85255 EPA Est. No. U.S. Patent Nos]			
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