

64240-42

6/11/2009

10A7



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Georgia Anastasiou
Lewis & Harrison, LLC
For Combat Control Systems
122 C. Street NW # 740
Washington, D.C. 20001

JUN 11 2009

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Alternate Brand Name "Combat Source Kill Max A2"
EPA Reg. 64240-42
Application Dated May 22, 2009

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 05/22/09 for the above product. The Registration Division (RD) has conducted a review 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,

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

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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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. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW <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: <p style="text-align: center;">NOTIFICATION</p> EPA Reg. No. _____ <p style="text-align: right; margin-right: 50px;">JUN 11 2009</p> Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

NOTIFICATION OF ALTERNATE BRAND NAME:

Combat Source Kill Max A2

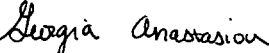
PLEASE READ COVER LETTER FOR DETAILS.

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 <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	<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	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application):		
Name Georgia Anastasiou - 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. 19
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 	3. Title Agent for Combat Insect Control System	
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date May 22, 2009	

3027

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 A2]

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

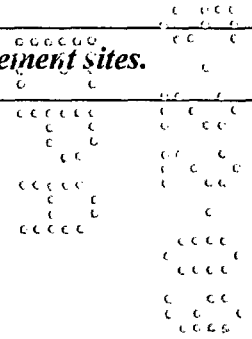
EPA Reg. No. 64240-42
EPA Est. No. _____

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. _____]



NOTIFICATION

JUN 11 2009

4087

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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

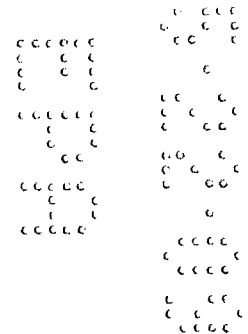
STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

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.



[[The paperboard in this] [C]carton [contains] [is made from] _____%
Recycled fiber [minimum _____% post consumer content].]



50f7

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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 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]

6007

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Combat ABF7
Pg 4 of 5

[**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.]

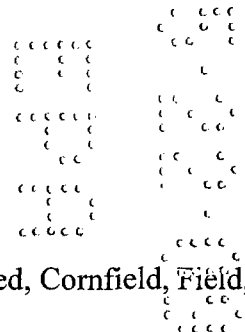
[Gel placements should be near ant trails, next to ant nests or in areas of suspected ant activity.]

[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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Master Label, July 2008
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Combat ABF7
Pg 5 of 5

UNIT (Syringe) LABEL [Not shown actual size]

COMBAT® ABF7

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.**

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[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
19001 N. Scottsdale Rd., Scottsdale, AZ 85255

EPA Reg. No. 64240-42
EPA Est. No. _____

[U.S. Patent Nos. _____]

SEE CARTON [INSERT] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT _____

NOTIFICATION
JUN 11 2009