



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 31 2010

Ms. Georgia Anastasiou
Combat Insect Control Systems
c/o Henkel Consumer Goods Inc.
19001 N. Scottsdale Rd.
Scottsdale, AZ 85225

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Ms. Anastasiou:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice PRN 2007-4 dated March 1, 2010 for the following product(s):

Combat Ant Bait F1 (EPA Reg. No. 64240-30)
Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)
Combat ABF7 (EPA Reg. No. 64240-42)
Combat Quick Kill Roach Killer Gel (EPA Reg. No. 64240-45)
Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-98-10. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,



Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

3098

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

March 1, 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 F1 (EPA Reg. No. 64240-30)
 Combat Large Roach Bait F.03 (EPA Reg. No. 64240-34)
 Combat ABF7 (EPA Reg. No. 64240-42)
 Combat Quick Kill Roach Killing Gel (EPA Reg. No. 64240-45)
 Combat QK Roach Killing Gel F45 (EPA Reg. No. 64240-63)

Dear Mr. Gebken:

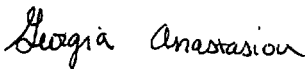
On behalf of Combat Insect Control Systems, I am submitting notifications for the products listed above. The purpose of this submission is to update the storage and disposal section in accordance with PR Notice 2007-4.

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.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: David Rickard (Combat)

Faint, illegible text or stamp in the bottom right corner of the page.

4 of 8

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

[Bracketed information is optional text.]

Underlined or Highlighted text is new.

COMBAT® ABF7
Approved Alternate Brand Names:
[Combat Ant Killing Gel]
[Combat Source Kill Max A2]

NOTIFICATION
MAR 3 1 2010

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

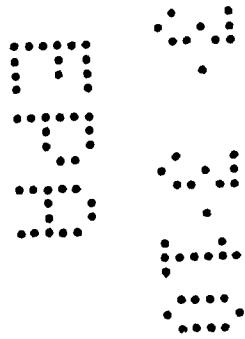
EPA Reg. No. 64240-42
EPA Est. No. _____

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. _____]



5048

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

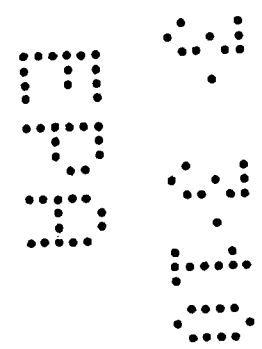
STORAGE: Store in a cool, dry area *-or-* below 80°F *-or-* 100°F out of reach of children.

DISPOSAL: **If empty:** Nonrefillable container. Do not reuse or refill this container. Recap syringe[s] *-or-* reservoir[s] and offer for recycling if available. If recycling is not available, place in trash. **If partially filled:** Recap syringe[s] *-or-* reservoir[s] and call your local solid waste agency [or toll free number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.



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



6098

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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.

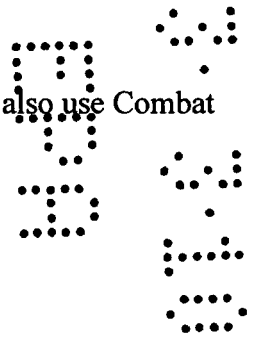
1. Inspect for ants: Place gel in areas of suspected ant activity, next to ant trails and near ant nests. Avoid applying gel in direct sunlight. Gel can be placed in cracks, crevices, corners, and areas such as under and behind kitchen appliances, along baseboards, under sinks, in pantry, around pipes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



7098

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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.]

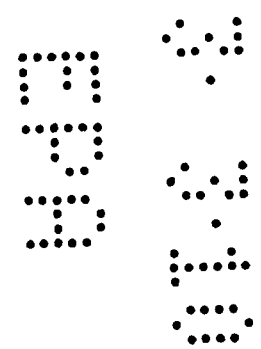
[You will notice fewer ants in days] [Pest population reduction will be apparent within a week]
[Keep [exposed] *-or-* [applied] gel away from open food and food contact surfaces. Do not treat food/feed preparation surfaces.]

[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]



8098

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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: Nonrefillable container. Do not reuse or refill this container. Recap syringe[s] *-or-* reservoir[s] and offer for recycling if available. If recycling is not available, place in trash. **If partially filled:** Recap syringe[s] *-or-* reservoir[s] and call your local solid waste agency [or toll free number] 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.

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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 _____

