

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Georgia Anastasiou Agent for Combat Insect Control Systems c/o Lewis and Harrison, LLC 122 C Street, NW, Suite 740 Washington, DC 20001

NOTIFICATION DEC 2 1 2011

Subject:

Application for Pesticide Notification

EPA Registration Number: 64240-42 Date of Submission: December 7, 2011

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated December 7, 2011, for the abovementioned product. 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 regarding this letter, please contact Clayton Myers at (703) 347-8874, or via email at <a href="mailto:myers.clayton@epa.gov">myers.clayton@epa.gov</a>.

Sincerely,

Richard Gebken
Product Manager

Insecticide Branch

Registration Division (7505P)

Enclosures:

Copy of Label Stamped "Notification"

Please read instructions on reverse	before completing for	rm.	Form Approve	d, CiviB No. 2070	-0060, Approval expires 05-31-98		
O EDA	d States	☐ Registr	ation	OPP Identifier Number			
EPA	<b>Environmental F</b>	Protection Agency					
	Washingto	n, DC 20460					
			Other				
Application for Pesticide - Section I							
Company/Product Number			EPA Product Manager		Proposed Classification		
64240-42		Richard	Richard Gebken				
4. Company/Product (Name)	PM#		None Restricted				
Combat ABF7	10						
5. Name and Address of Applicar	t (Include ZIP Code)	6. Expe	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)				
Combat Insect Control Sy		(b)(l), my product is similar or identical in composition and labeling					
c/o Henkel Consumer Goods	to:	to:					
19001 N. Scottsdale Rd. Scottsdale, AZ 85255		EPA Re	EPA Reg. No				
NOTE: PLEASE SEND ALL C	ORRESPONDENCE	TO Droduo	Product Name				
"CONTACT POINT" LISTED	BELOW	Produc	t Name				
Check if this is a ne	w address						
		Section	on - II				
Amendment - Explain belo	w.		Final printed labe	els in response to	Agency letter dated		
Resubmission in response		d	Me Too" Applica				
Notification - Explain bel	ow.		Other - Explain b	pelow			
Explanation: Use addition	onal page(s) if ned	cessary. (For Section	on I and Section II.)				
		NOTIFICA	ATION				
		ion of graphics a					
Nationalism in Assertance With	THE RESIDENCE OF THE PARTY OF T	ASE READ COVER I		Market State State Control of the State St	regulations at 40 CFR 152.46, and no		
					violation of 18 U.S.C. Sec 1001 to		
					Notice 95-2 and 40 CFR 152.46, this		
product may be in	Violation of FIFKA and	I may be the subject to en		antes under section	s 12 and 14 of FIFRA.		
		Sectio	n – III				
Material This Product Will Be Child-Resistant Packaging	Packaged In: Unit Packagi	ng I	Water Soluble Pack	raging	2. Type of Container		
Yes*	Yes	9	Yes		Metal		
□ No	□ No		□ No		Plastic		
	If "Yes"	No. per	If "Yes"	No. per	Glass		
*Certification must	Unit Packagi	ng wgt. container	Package wgt.	container	Paper		
be submitted					Other (Specify)		
3. Location of Net Contents Info	rmation	1. Size(s) Retail Containe	er	5. Location	of Label Directions		
Label	Container			On Labe	ı		
	5 - 11 - D - 1 - 1	□		On label	ing accompanying product		
6. Manner in Which Label is Af	rixed to Product	☐ Lithograph ☐ Paper glued	Other				
		Stenciled			c ccccc		
Section – IV							
1. Contact Point (Complete iten	ns directly below for id	dentification of individual	to be contacted, if nece	essary, to proces	s this application)		
Name Georgia Anastasiou - Lev 122 C St. NW #740, Wash		Title	mbat Insect Contr		Telephone No. (Include Area Code)		
122 C St. NW #140, Wash		ertification	mat misect contr	or Systems;	3. Date Application		
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 (Stamped)							
under applicable law.	3. Title		1				
2. Signature			Agent for Combat Insect Control System				
Leogia anavasion				Court			
4. Typed Name	5. Date	December 7 2044					
Georgia Anastasiou - Lew		December 7, 2011		a Milk hallowed and the same			



122 C Street, N.W., Suite 740 Washington, D.C. 20001

telephone 202.393.3903 fax 202.393.3906

Consultants in Government Affairs

December 7, 2011

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

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification in accordance with PR Notice 98-10 for the product Combat ABF7 (EPA Reg. No. 64240-42). I am proposing the following changes to the label:

- 1. Minor language revisions to the label. All changes have been highlighted in the enclosed copy of the label.
- 2. Addition of graphics that depict where the product can be used.
- 3. Revisions to the syringe label to make some of the language optional. Currently the label language on the syringe is too difficult for customers to read because the size of the syringe is small which limits the amount of language that can legibly be displayed. In accordance with the EPA Label Review Manual (Section V), we intend to display the required language specified for small containers as well as the precautionary statements. Please note all the label language will be located on the outside carton.

Enclosed please find the following documents in support of this submission:

- A) Application for Pesticide;
- B) One (1) copy of the label with changes highlighted; and,
- C) Two (2) copies of the revised 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,

Lugia Anastasion

Georgia Anastasiou

Agent for,

Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

# **COMBAT® ABF7**

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

ACTIVE INGREDIENT: Fipronil† OTHER INGREDIENTS: †CAS No. 120068-37-3			
USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN KEEP OUT OF REACH OF CHILDREN CAUTION	N AND PETS		
[Avoid contact with textiles and clothing as bait may stain.] [Product may stain textiles and clothing.]			
SEE PRECAUTIONS ON [END] [SIDE] [BACK] [BOTTOM P.	ANEL].		
Distributed by & ©2011 Combat Insect Control Systems [19001 N. Scottsdale Rd.], Scottsdale, AZ 85255 MADE IN [USA] [KOREA]	EPA Reg. No. 64240-42 EPA Est. No		
[Combat GUARANTEED to work] Contains 1 [reservoir] [syringe]			
TOTAL NET WT 0.95 oz (27g)			
The label may include illustrations of suggested app	lication placement sites.		
[U.S. PATENT NOS]			

### 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 [below] [80°F] [100°F] out of reach of children. DISPOSAL: If empty: Nonrefillable container. Do not reuse or refill this container. Recap [syringe] [reservoir] and offer for recycling if available. If recycling is not available, place in trash. If partially filled: Recap [syringe] [reservoir] and call your local solid waste agency [or toll free number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

<u>Note to Reviewer</u>: 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.

carton [contains] [is made from]	%	
		CCCCC

### [GENERAL INFORMATION]

#### DIRECTIONS FOR USE

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

[[THIS IS] [HOW] [THIS] COMBAT® [Alternate Brand Name] WORKS]

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<sup>TM</sup>.

[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] [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] [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]

[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] [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.

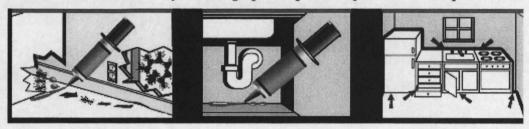
For questions or comments about COMBAT, call 1-800-426-6228.

### 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] [100°F]

## **Optional Graphics**

Note to reviewer: Label may include graphic depictions of recommended placement locations.



ceece

UNIT (Syringe) LABEL [Not shown actual size]

# COMBAT® ABF7

Note: Do not remove this label.	
ACTIVE INGREDIENT: Fipronil†	
†CAS No. 120068-37-3	99.99976
KEEP OUT OF REACH OF CHILDREN	AND DETC
USE ONLY IN AREAS INACCESSIBLE TO CHILDREN A	AND PETS.
PRECAUTIONARY STATEMENTS:	
Hazards to Humans and Domestic Animals	
CAUTION: Harmful if swallowed or absorbed through the skir	n. 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 v	vater after handling.
[PHYSICAL OR CHEMICAL HAZARDS:	
Do not use this product in or on electrical equipment where a po	
[FIRST AID: Call a poison control center or doctor for treatme	
IF ON SKIN OR CLOTHING: Take off contaminated clothin	
water for 15-20 minutes. [Have the product container or label w or doctor or going for treatment.]	ith you when calling a poison control center
<b>IF IN EYES:</b> Hold eye open and rinse slowly and gently with v	water for 15-20 minutes Remove contact
lenses, if present, after the first 5 minutes, then continue rinsing	
for treatment advice.] Have the product container or label with y	
doctor or going for treatment.]	5 1
[HOT LINE NUMBER:] Combat [information] Helpline: 1-80	0-426-6228
[STORAGE AND DISPOSAL: Do not contaminate water, food	d 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: Nonrefillable container. Do not reuse of	
reservoir[s] and offer for recycling if available. If recycling is no	
Recap syringe[s] -or- reservoir[s] and call your local solid waste	
instructions. Never place unused product down any indoor or our	
[If the gel inside the tube is darker than this color, do not ap	oply.]
Product may stain textiles and clothing.	1 000 407 7000
[For] Questions or [C]comments [?] [about Combat,] call toll fre	
Distributed by & ©2011 Combat Insect Control Systems 19001 N. Scottsdale Rd., Scottsdale, AZ 85255	EPA Reg. No. 04240-42
[U.S. Patent Nos. ]	EPA Est. No.
[0.0.1 40010 1100.	

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

NET WT 0.95 oz (27g)