



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MAY 0 1 2014

Ms. Georgia Anastasiou Combat Insect Control Systems c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001

Subject: Label Amendment - Add Marketing Language and Graphics

Product Name: Combat ABF7 EPA Registration Number: 64240-42 Submission Date: March 21, 2014 Decision Number: 490631

#### Dear Ms. Anastasiou:

The label amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is <u>acceptable</u>.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Products released for shipment after 18 months from the date on this notice or the next printing of the master label whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Amended labeling will supersede all previously accepted labels. Your release for shipment of this product constitutes acceptance of these conditions. As required by 40 CFR 156.10(a)(6), you must submit one copy of the final printed label before the product is released for shipment. If you have any questions please contact Carlyn Petrella by phone at (703) 347-0439 or via email at "petrella.carlyn@epa.gov".

Sincerely

Richard Gebken

Team Leader / Product Manager (10)

Insecticide Branch

Registration Division (7505P) Office of Pesticide Programs **COMBAT® ABF7** 

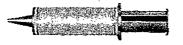
Approved Alternate Brand Names:

[Combat Ant Killing Gel]
[Combat Source Kill Max A2]
[Combat Max Ant Killing Gel]

ACCEPTED MAY 0 1 2014

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 64240-42





[Manufactured for] [Distributed by] [&] ©[year] Combat Insect Control Systems [7201] [E. Henkel Way], Scottsdale, [AZ] [ARIZONA] 85255 MADE IN [USA][KOREA]	
SEE PRECAUTIONARY STATEMENTS ON [END] [SIDE] [BACK] [BOTTON	1] [PANEL].
[Avoid contact with textiles and clothing as bait may stain.] [Product may stain textiles and clothing.]	
USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS KEEP OUT OF REACH OF CHILDREN CAUTION	
†CAS No. 120068-37-3	99.939%

#### PRECAUTIONARY STATEMENTS:

#### Hazairds 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 and before eating, drinking, chewing gum, using tobacco or using the toilet.

#### 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

STOKAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. STOKAGE: Store in [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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

<u>{Note in Reviewer:</u> Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each syringe.}

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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.]
Highlighted text is new.

#### For front or back or side panel:

[Satisfaction guaranteed] [Combat] [Guaranteed to work] [or your money back][!]

[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[For information, call the Combat® [Labs] [Information] Helpline at 1-800-426-6228.]

[[For questions or comments] [about Combat], [please] call the Combat<sup>®</sup> [Labs] [Information] Helpline at 1-800-426-6228 [for information].

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

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

[[The] [Paperboard in this] Carton [contains] [is made from]	% Recycled fiber [minimum
% post consumer content].] [PLEASE RECYCLE EMPTY CART	ON]

Optional Henkel Quality statement for front or back or side panel:





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# [GENERAL INFORMATION]

## [[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]

#### **DIRECTIONS FOR USE**

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

#### 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.

-0131...

- 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 [another Combat product name] [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] [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.]

### Optional Claims for front or back

- · Fast killing formula
- Kills [quickly] [fast]
- 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
- Prefeired 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]
- [Destroys] [kill[s]] the [nest] [colony]
- Kill the ones you see and the ones you don't [see]
- Kill's [the] [entire] nest
- [Your] secret weapon [against ants]
- [Combat®] [Alternate Brand Name] formula attracts ants with the food and water they need.
- This ant-killing gel starts killing ants within a matter of hours.
- [Use] near doorways
- [Use] near windows
- [Use] near cracks and crevices
- [For] Indoor[s] & outdoor[s] [use]
- [Combat®] [Alternate Brand Name] contains a blend of undetectable insecticide and a food matrix that attracts ants in search of food and water.
- [Combat®] [Alternate Brand Name] [gel] [bait] can be applied in hard to reach places where other baits won't work.
- Ants share the blend of food and insecticide with other ants in the colony [to kill the ones you see and the ones you don't [see].
- [Ant] [killing] [Gel] [bait]
- For hard-to-reach places [such as cracks and crevices]

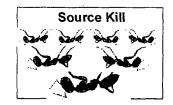
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# Optional Claims

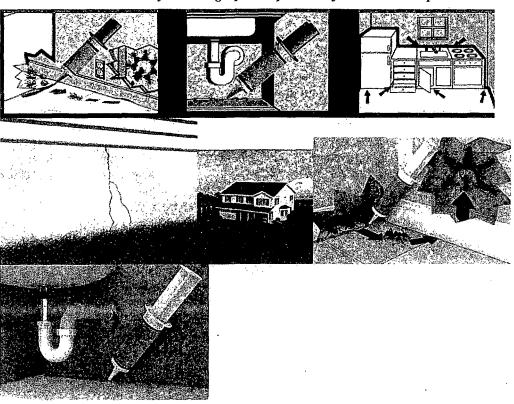






# **Optional Graphics**

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



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[Bracketed information is optional text.]

Highlighted text is new.

UNIT (Syringe) LABEL [Not shown actual size]

Note: Do not remove this label.

# COMBAT® ABF7 [ANT]

	0.0010/
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 P	ETS.
PRECAUTIONARY STATEMENTS:	•
Hazards to Humans and Domestic Animals	
CAUTION: Harmful if swallowed or absorbed through the skin. Cau	
contact with skin, eyes, and clothing. Prolonged or frequently repeated	
reactions in some individuals. Wash thoroughly with soap and water a	fter handling and before eating,
drinking, chewing gum, using tobacco or using the toilet.	
[PHYSICAL OR CHEMICAL HAZARDS:	
Do not use this product in or on electrical equipment where a possibilit	
[FIRST AID: Call a poison control center or doctor for treatment advi	
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rin	
water for 15-20 minutes. [Have the product container or label with you	i when calling a poison control center
or doctor or going for treatment.]	15.00
IF IN EYES: Hold eye open and rinse slowly and gently with water for	
lenses, if present, after the first 5 minutes, then continue rinsing eye. [6	
for treatment advice.] Have the product container or label with you wh	en calling a poison control center or
doctor or going for treatment.]	
[HOT LINE NUMBER:] Combat [information] Helpline: 1-800-426- [STORAGE AND DISPOSAL: Do not contaminate water, food or fee	
[STORAGE: Store in cool, dry area -or-below 80°F -or-100°F out of	· · · · · · · · · · · · · · · · · · ·
DISPOSAL: If empty: Nonrefillable container. Do not reuse or refill	
reservoir[s] and offer for recycling if available. If recycling is not available.	
Recap syringe[s] -or- reservoir[s] and call your local solid waste agency	
instructions. Never place unused product down any indoor or outdoor	
[If the gel inside the tube is darker than this color , do not apply.]	uranı.
Product may stain textiles and clothing.	
[For] Questions or [C] comments [?] [about Combat,] [call toll free] 1-8	200-426-6228
[Manufactured for] [Distributed by] [&] © [year] Combat Insect Control	
[7201] [E. Henkel Way], Scottsdale, [AZ] [ARIZONA] 85255	or by stoms
MADE IN [USA][KOREA]	•
EPA Reg. No. 64240-42 EPA Est. No	
[U.S. Pavent Nos]	
[O.D. A MOSILE FOOD.	
SEE CARTON [INSERT] FOR COMPLETE DIRECTIO	NS AND PRECAUTIONS

NET WT 0.95 oz (27g)