

64240-48

03/11/2009

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MAR 11 2009

Ms. Georgia Anastasiou  
Agent for Combat Insect Control Systems  
Lewis & Harrison, LLC  
122 C Street, N.W. Suite # 740  
Washington, DC 20001

RE: Notification of Alternate Brand Names: Combat Insect Control Systems  
EPA Registration Number: 64240-48  
Date of Submission: January 8, 2009

Dear Mrs. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 8, 2009, for the product, Combat Quick Kill Ant Killing Gel Bait Stations. 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 me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

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



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# 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

January 8, 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 Quick Kill Ant Killing Gel Bait Stations (EPA Reg. No. 64240-48)  
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 name for the product Combat Quick Kill Ant Killing Gel Bait Stations (EPA Reg. No. 64240-48):

**Combat® Gel Ant Bait**

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.

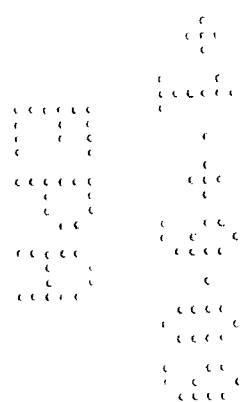
If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com. I thank you in advance for your cooperation.

Sincerely,



Georgia Anastasiou  
Agent for,  
Combat Insect Control Systems

cc: David Rickard (Combat Insect Control Systems)

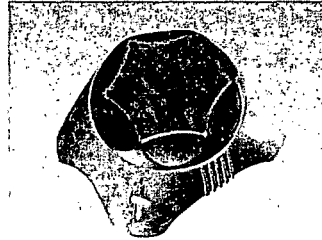
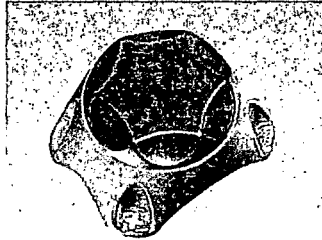


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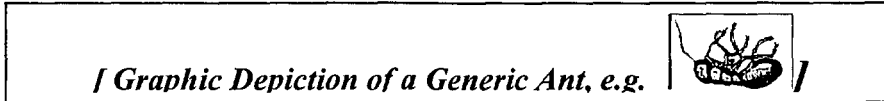
# COMBAT® Quick Kill Ant Killing Gel Bait Station

Alternate Brand Name:

[Combat Gel Ant Bait]



- or -



ACTIVE INGREDIENT: Fipronil†.....0.001%  
OTHER INGREDIENTS: .....99.999%  
† CAS No. 120068-37-3

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION: See precautionary statements on back -or- side panel.**

EPA Reg. No. 64240-48

EPA Est. No. \_\_\_\_\_

[Manufactured for] [Distributed by] & ©2008 Combat Insect Control Systems  
[15101] [19001] N. Scottsdale Rd., Scottsdale, [AZ] [ARIZONA] [85254] [85255]  
[MADE IN U.S.A.]  
[U.S. PATENT NOS. \_\_\_\_\_]

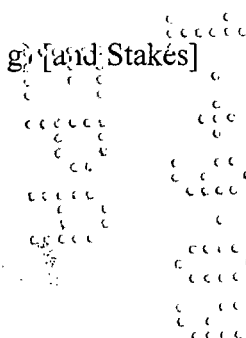
Contains 1 [to] [-] 6 [Gel] Bait Station[s],[,] Each Containing[:] 0.16 oz. (4.5 g) [and Stakes]  
[TOTAL] NET WT[:] 0.16 oz. (4.5 g) [to] [-] 0.95 oz. (27 g)

-or-

Contains 1 [to] [-] 4 [Gel] Bait Station[s],[,] Each Containing[:] 0.24 oz. (6.75 g) [and Stakes]  
[TOTAL] NET WT[:] 0.24 oz. (6.75 g) [to] [-] 0.95 oz (27 g)

**NOTIFICATION**

**MAR 11 2009**



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## PRECAUTIONARY STATEMENTS

### CAUTION

#### Hazards to Humans and Domestic Animals:

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling and before eating, chewing gum, or using tobacco.

#### First Aid:

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

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.
- 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. You may also call 1-800-426-6228 for emergency medical treatment information.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

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

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

**DISPOSAL: If empty:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partly filled:** 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.

*{ Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code number will be laser-coded on each primary package of the product after the container is sealed. }*

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

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

 [The] [P]aperboard in this [C]arton [contains] [is made from] \_\_\_\_\_% Recycled fiber [minimum \_\_\_\_\_% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

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## DIRECTIONS FOR USE

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

### GENERAL INFORMATION

This product provides FAST CONTROL of Ants in 3-5 days.

This product is formulated to effectively control 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™.

[This is] How [This Product] [Combat®] [Quick Kill Ant Killing Gel Bait Station] (or Alternate Brand Name) Works:

1. Ants enter bait station and leave after [eating] [feeding on] bait inside.

- or -

This product will attract foraging [worker] ants to the bait feeding station. The ants will feed on the bait.

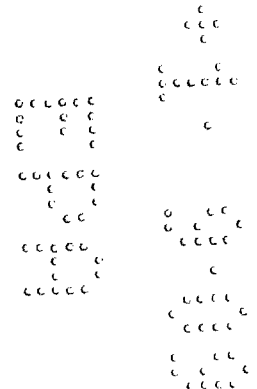
2. Ants carry bait back to colony so that it can kill the queen and other ants.

- or -

Worker ants will take some of the bait back to the nest where they pass it on to [kill] [destroy] the queen and entire colony.

*The label may include illustrations of suggested placement sites.*

- Do not interfere with the ants or bait stations during use.
- Replace [bait stations] if ants return.
- Do not use sprays on or around the [product] [stations].
- [Do not use strong cleaners around bait placements]
- Do not remove [or puncture] label on the [bait station[s]].
- Place bait stations out of reach of pets.



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## **DIRECTIONS FOR USE** (continued)

### **For indoor use:**

1. Inspect for ants. Place bait stations near [an] ant trail[s] or where [you frequently see ants] [ants may enter your home]; near cracks, crevices, [and] along sill[.] [under and behind kitchen appliances, along baseboards, under sinks, in pantry, around pipes and water heater and in the garage and attic.] Use all bait stations.

[NOTE:] [Do not place bait stations in areas which have been recently sprayed with insecticide or contaminated with foggers, and do not spray insecticide over bait stations as this may cause the bait to become repellent.]

2. Place the bait station on a horizontal surface. While holding the bait station securely, activate the bait station by rotating [turning] the closure [1/4 *-or-* one quarter] [1/2 *-or-* one half] turn [counter-clockwise] [in the direction of the arrow] [to break the seal].

*-or-*

While holding the bait station securely, activate the bait station by rotating [turning] the closure [counter-clockwise] [in the direction of the arrow] until the [marks] [arrows] [indicators] line up[, indicating that the seal has been broken].

This opens the entrance holes in the bait station to allow ants access to the bait.

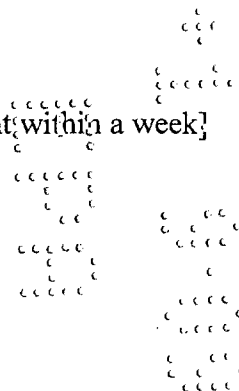
[In more open areas, inside cabinets, and near food, also use Combat Quick Kill Formula 3 baits for maximum ant control]

### **For outdoor use (adjacent to the home):**

1. Place bait station on the ground near [an] ant trail[s] or where you [frequently see ants *-or-* where [you have seen] ants [are entering] [may enter] your home; near cracks, crevices, [and] doors [openings in the foundation] [,] [and] [along sills]. Use all bait stations.
2. Place the bait station on a horizontal surface. While holding the bait station securely, activate the bait station by rotating [turning] the closure [counter-clockwise] [in the direction of the arrow] until the [marks] [arrows] [indicators] line up[, indicating that the seal has been broken]. This opens the entrance holes in the bait station to allow ants access to the bait.

To use the optional stake[s]: Once the station has been activated, place [the] stake[s] through the [stake] opening[s] [hole[s]] on the [side[s]] [corner[s]] of [the] [bait] station and push down on stake[s] to insert [it] [them] into the ground.

[You will notice fewer ants in days] [Ant population reduction will be apparent within a week]



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**Claims for front or back panel of label**

**Efficacy Claims**

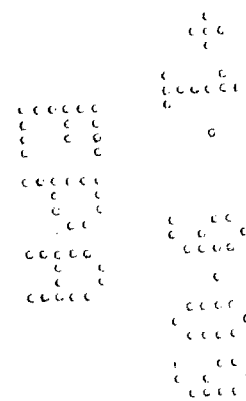
- A [durable] [weather-durable] bait station [product]
- Fast killing formula
- Kills Ants and the colony
- Gain control of your Ant problem
- Provides control of Ants
- Kills Ants in the colony
- Effective against Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, Little Black Ants
- Satisfaction [Quality] guaranteed
- With Fipronil

**Value claims:**

**Value claims below are only for packs with net contents greater than 1 bait but not to exceed 6:**

- Bonus Pack
- [1] [2] [3] [More] [Bonus] Bait(s) With Purchase
- [25%] [1/4] More [Free] \*
- [33%] [1/3] More [Free] \*
- [50%] [1/2] More [Free] \*
- 100% More [Free] \*
- [25%] [33%] [50%] [100%] More Baits \*
- More Baits — Better Value \*
- Value Pack — More Baits \*

\*vs. standard size of this product





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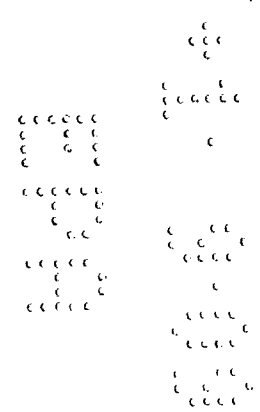
## **Claims for front or back panel of label**

### **Secondary Kill Claims**

- [Kills] [Stops] [Eliminates] [the] queen and [the] [entire] colony
- [Kills] [Stops] [Eliminates] [the ant source] [the ants you see and ones you don't see] [entire [ant] colony]
- [Kills] [Destroys] the [queen and] [ant] colony [nest]
- Ants carry [Combat] [bait] [ingredients] back to the colony to stop [kill] the queen [and other ants] [so they don't invade your home [kitchen]]
- [Kills] [Stops] ants where they [live] [nest]
- [Worker] Ants take [it] [Combat][']s ingredients back to the [nest] [queen]

### **Duration/Prevention Claims**

- Elimination [Control] in as little as 3-5- days
- Works in as little as hours and up to 1 month
- Visible results overnight
- Starts killing [Ants] in hours
- Fast acting formula that quickly kills Ants
- Kills ant continuously
- Kills non-stop
- [Ongoing] Non-stop] ant control
- Kills quickly and keeps on killing [ants] [back at the nest]
- Keeps [killing] [working] until [it's] [the bait is] gone

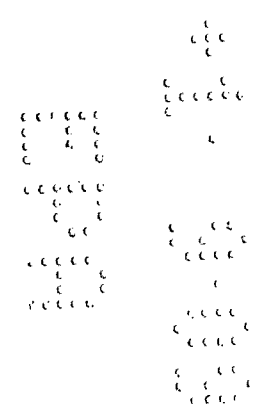


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## Claims for front or back panel of label

### Attributes

- This product is effective because ants carry bait back [to where they live] [to the colony] [the colony] to [destroy] [stop] [kill] [the] queen [and entire colony].
- [Kills] [Stops] [Eliminates] ants [without messy residue and] without insecticide odors [and] [or] [fumes]
- Works [without messy residue and] without insecticide odors [or fumes]
- [This [product] is] easy to use [and has no insecticide odor]
- No insecticide odor
- [Kills] [Stops] [Eliminates] indoor and outdoor (adjacent to the home) ants
- [Kills] [Stops] ants outdoors (adjacent to the home) before they come indoors [so that they don't invade your home]
- It even kills ants [you don't see] [outside (adjacent to the home)] [to prevent more ants from coming inside]
- Outdoor (adjacent to the home) [ant] control
- Easy-to-use [Easy to use]
- Food [&][and][+] water [formulation] attracts worker ants to the bait [stations]
- What ants are looking for



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UNIT LABEL  
[Not actual size]

NOTIFICATION

COMBAT® Quick Kill Ant Killing Gel Bait Station MAR 11 2009

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove this label.

[ Graphic depiction of ant, e.g.  ]

ACTIVE INGREDIENT: Fipronil†.....0.001%  
OTHER INGREDIENTS: .....99.999%  
† CAS No. 120068-37-3

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling and before eating, chewing gum, or using tobacco.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

**DISPOSAL: If empty:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid water agency or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For questions, comments or information about COMBAT, call toll free 1-800-426-6228.]  
[Questions or Comments? Call 1-800-426-6228.]

EPA Reg. No. 64240-48 EPA Est. No. \_\_\_\_\_  
[Manufactured for] [Distributed by] & ©2008 Combat Insect Control Systems  
[15101] [19001] N. Scottsdale Rd.,] Scottsdale, [AZ] [ARIZONA] [85254] [85255]

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

[NET CONTENTS]

[Contains] [1] [One] [Gel] Bait Station [Containing][:] [0.16 oz. (4.5 g)] -or- [0.24 oz. (6.75 g)]

NOTIFICATION  
MAR 11 2009

