

64240-48

04/28/2009

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 28, 2009

Mr. Eliot Harrison,
Agent for
Combat Insect Control Systems
15501 N. Scottsdale Road
Scottsdale, AZ 85260

Subject: Request to add proposed Alternate Brand Names.
"COMBAT Quick Kill Ant Killing Gel Bait Station"
EPA Reg. Nos. 64240-48
Application dated May December 09, 2008

Dear Mr. Harrison:

The above referenced labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable with the following comments:

- Delete all proposed alternate brand names from labeling, except "Combat Quick Kill Ant Gel Bait" and "Combat Platinum Brand Ant Gel Bait".

Please note that we have approved the amended labeling for this product with the understanding that it is consistent with the Agency's last stamped accepted label (dated 10/09/08), and that you have made all revisions to the labeling, per our Notice of Registration (dated 10/09/08). See enclosed copy of the stamped label for your record. If you have any questions concerning this action please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely,

Richard Gebken

Richard Gebken,
Product Manager 10
Insecticide Branch
Registration Division (7505P)

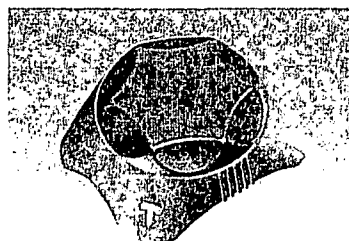
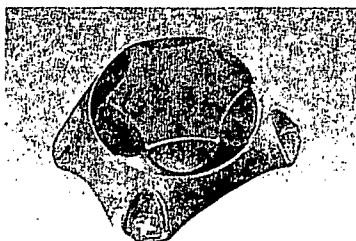
Enclosure

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COMBAT® Quick Kill Ant Killing Gel Bait Station

Alternate Brand Names:

- [Combat Source Kill Pro Ant Gel Bait] ✓
- [Combat Source Kill Max Ant Bait] ✓
- [Combat Quick Kill Ant Gel Bait] ✓
- [Combat Platinum Brand Ant Gel Bait] ✓ ?



- or -



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

ACCEPTED
 With COMMENTS
 In EPA Letter Dated:
 APR 28 2009

KEEP OUT OF REACH OF CHILDREN

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

**Under the Federal Insecticide, Fungicide
 and Rodenticide Act, As amended, for the
 pesticide Registered under EPA Reg. No:**

64240-48

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)

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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

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]

COMBAT® Quick Kill Ant Killing Gel Bait Station

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)]