



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 15, 2016

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

Subject: Label Amendment – Clarification of Direction for Use and addition of diagrams and marketing language
Product Name: Combat Vulcano AG
EPA Registration Number: 64240-71
Application Date: September 28, 2016
Decision Number: 522559

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

Page 2 of 2
EPA Reg. No. 64240-71
Decision No. 522559

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Tim Ciarlo by phone at 703-347-8082, or via email at Ciarlo.Timothy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a large, hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

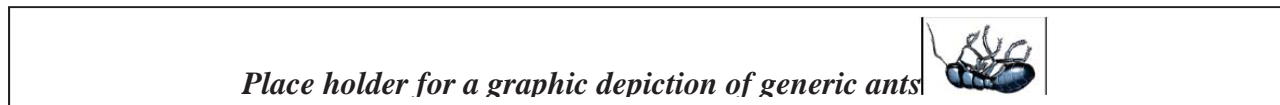
Note: Bold, Italicized text is information for the reader and is not part of the label.
[Bracketed information is optional text.]

Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 1 of 15

Date: December 5, 2016

COMBAT[®] Vulcano AG

Approved Alternate Brand Names:
Combat Max Ant Killing Gel Bait



ACTIVE INGREDIENT: Fipronil†.....0.001%
OTHER INGREDIENTS:99.999%
TOTAL.....100.000%
†CAS No. 120068-37-3

**USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS
KEEP OUT OF REACH OF CHILDREN**

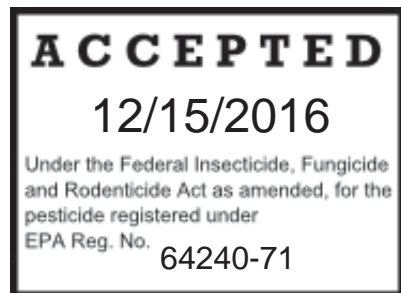
CAUTION: See [side] [and][or] [back] [panel] [of carton] for additional precautionary statements and directions

Packaging can contain between 1-12 bait stations.
Contains: 1-12 [Bait] Stations
[Each Containing: 0.070 oz (2.0 g) - 0.176 oz (5.0 g)]
[TOTAL] NET WT: _____

EPA Reg. No: 64240-71
EPA Est. No. _____

[Manufactured for] [Distributed by] & © year
Combat Insect Control Systems
[7201 E. Henkel Way] Scottsdale, AZ 85255
MADE IN [USA][KOREA][ITALY]

Patent Pending/Number



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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 2 of 15

Date: December 5, 2016

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

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

FIRST AID:

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice. If in Eyes: Hold eye open, rinse slowly and gently with water for 15 to 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.

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

PESTICIDE STORAGE: Store in [a] cool, dry area out of reach of children.

CONTAINER HANDLING:

Nonrefillable container. **If empty:** 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 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 appear on each bait station.}

For front or back or side panel – Optional language:

Satisfaction guaranteed or your money back!

Guaranteed to work or your money back!

EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this product with a full Satisfaction Guarantee. Should you have any questions regarding COMBAT® products, please call 1-800-426-6228] [Or visit [www.combatbugs.com]

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



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



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

All trademarks and the distinctive design and elements of this package are proprietary to and owned by Henkel and its affiliates in the USA and elsewhere.

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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 3 of 15

Date: December 5, 2016

For front or back or side panel – Optional language (continued):

PRODUCT/USE INFORMATION

This product provides control of ants* in as little as 3-5 days.

This product is formulated to effectively control ants*.

That's because this product contains Fipronil, as its active ingredient.

Its speed is [still] slow enough for foraging ants to return to the colony/nest and feed the bait to larvae and queen so that the entire colony/nest is killed by the Domino Effect™.

How This Product Works:

1. Ants enter the bait station and eat the bait.
2. Ants take the bait back to the nest.
3. Ants pass the bait on to the queen and kill the entire colony.

Do not interfere with the ants or [gel] [bait] stations during use.
Place [bait] stations out of reach of children and pets.

EFFECTIVE AGAINST -or- ATTRACTS AND KILLS - or- KILLS

COMMON HOUSEHOLD ANTS* INCLUDING: Argentine , Ghost , Cornfield , Pavement , Acrobat , White footed , Little black , Odorous house , Crazy , Big headed , [and other sweet eating ants] ants.

FOR USE IN AND AROUND: Homes, Hospitals, Restaurants, Apartments, Grocery Stores, Institutional Buildings, Schools, Cafeterias, Warehouses, Storage Areas, Food Processing Plants, Mobile Homes, Boats, Military Bases, Theatres, Nursing Homes, and on Military, Commercial, and Cruise Ships.

For Household Use: Closets, Basements, Attics, Reaction Rooms, Living Areas, Kitchens, Bathrooms, Dining Rooms, Pantries, Food Storage Shelving, Water Receptacles, etc.

TIPS

Do not spray insecticide on or around stations

Do not spray insecticide on or around the bait stations

Do not spray insecticide on or around the [bait] stations as sprays will contaminate bait[s] and reduce effectiveness.

Once opened, the stations may be left in place for up to 1 month.

Replace baits after 1 month.

Replace bait stations after 1 month.

Replace baits after 1 month to keep ants from returning.

Replace bait stations after 1 month to keep ants from returning.

Replace stations if ants return.

For effective ant control, all bait stations must be used.

For effective ant control, all bait stations must be used at one time.

For heavy infestations, we highly recommend using additional baits.

For heavy infestations, we highly recommend using additional bait stations.

Place more bait stations if ants return.

You will notice fewer ants in days.

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

Ant population reduction will be apparent within a week.

Ant population will be reduced in days.

Ant population will be reduced within a week

*Excluding carpenter, fire, pharaoh and harvester ants.

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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 4 of 15

Date: December 5, 2016

DIRECTIONS FOR USE

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

For indoor and outdoor (adjacent to the home) use:

- Place [bait] station on flat surface and remove the [clear] lid/cap.
- Push down on [sealed] capsule until it clicks into place and is ready to activate in step 3.
- Firmly press capsule to break bottom seal and release bait into station.
- Replace the [clear] lid/cap [to avoid humidity getting into the capsule]. Place station where ants are present. Replace [all] [bait] station[s] after 1 month.

For indoor use: Place baits near ant trails or where you frequently see ants. Place additional baits anywhere ants may enter your home.

For outdoor use: [For general control of ants* outdoors and to prevent them from coming indoors,] place [a] bait station(s) every 15-20 feet around the perimeter of your home. [Place additional bait stations near cracks or crevices, along sills, or anywhere ants may gain entry indoors.]

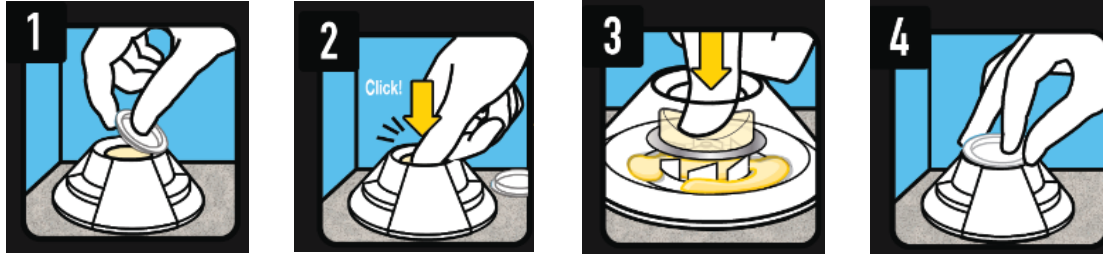
[The Diagram(s) above/below/at right/at left show(s) recommended placement locations.]

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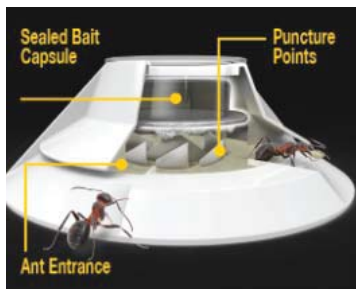
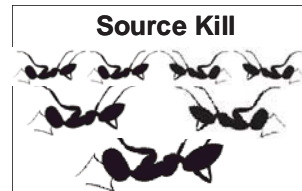
Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 5 of 15

Date: December 5, 2016

{Note: All photos below are optional. These or similar photos may be added to the directions for use or to the side/bottom panel.}



[Recommended [Bait] Station Placement/Locations:]



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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 6 of 15

Date: December 5, 2016

Optional claims for front or back or side panel of label

Design Claims:

1. Easy-to-use
2. Ready to Use
3. Leaves no [messy] residue
4. Leaves no messy clean up
5. There's no [residue or] mess to clean up
6. Convenient
7. No scissors required [for opening]
8. Mess-free
9. No mess [bait station]
10. No vapors, fumes or mess
11. No vapor, fumes or odor
12. No vapors or fumes
13. Kills/Stops ants without [messy] residue
14. Kills/Stops ants without [messy] residue and odors or fumes
15. Works without [messy] residue
16. Works without [messy] residue and without odors
17. Works without [messy] residue and without odors or fumes
18. This product is easy to use
19. This product is easy to use and has no insecticide odor
20. Bait(s) [stations] are easy to use
21. Bait(s) [stations] are easy to use and have no insecticide odor
22. No odor
23. No insecticide odor
24. The easy way to solve your ant* problem
25. The clean, easy way to solve your ant* problem
26. Pre-filled bait station[s]
27. Bait stations do not spill
28. COMBAT[®] gel bait stations do not spill
29. Leaves no mess
30. Leaves no spills
31. Spill proof
32. No drip
33. No drips
34. Sealed for freshness [ready for activation]
35. Sealed [gel capsule] and ready for activation
36. Fresh seal [pack]

Miscellaneous Claims:

37. For Indoor Use
38. For Indoor and Outdoor (adjacent to the home) Use
39. Effective for Indoor Use
40. Effective for Indoor and Outdoor (adjacent to the home) Use
41. Indoor and Outdoor (adjacent to the home) Use
42. COMBAT® [**alternate brand name**] [gel] ant killing bait [stations]
43. Ant*
44. Ants*
45. For ants*
46. Gel Technology
47. Gel Bait Technology
48. Ant [Gel] Bait Technology
49. Ants love sugar

Formula Claims:

50. A highly effective tool in the fight against ants*
51. A highly effective tool to fight your ant* problem
52. A highly effective tool to kill ants*
53. A sugar death for ants*
54. A sweet bait that ants* share killing them and the rest of the colony
55. A sweet gel bait that ants* share killing them and the rest of the colony
56. A Tri-Sugar death for ants*
57. Alternate Brand Name kills the ant* colony
58. Alternate Brand Name kills the ant* nest
59. Alternate Brand Name kills the colony
60. Alternate Brand Name kills the nest
61. Alternate brand name offers ants* both a food and water source
62. Alternate Brand Name that is highly attractive to ants*
63. Alternate Brand Name tri-sugar complex kills the ant* colony
64. Alternate Brand Name tri-sugar complex kills the colony
65. Alternate Brand Name tri-sugar complex kills the nest
66. Ant* Bait
67. Ant* Bait that lures them in with its sweetness only to provide them and their little friends with a deadly insecticide.
68. Ant* control in as little as 3-5 days
69. Ant* Killing Insecticide
70. Ants need energy. Carbohydrates such as sugar provides energy.
71. Ants need energy. Sugar provides energy.
72. Ants* are attracted to the bait and take it back to their nest/colony
73. Ants* are attracted to the sugar bait and take it back to their nest/colony

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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 8 of 15

Date: December 5, 2016

74. Ants* are attracted to the sugar gel bait and take it back to their nest/colony
75. Ants* are attracted to the tri-sugar bait and take it back to their nest/colony
76. Ants* are attracted to the tri-sugar gel bait and take it back to their nest/colony
77. Ants* can't help but share this bait with the rest of the colony
78. Ants* can't help but share this gel bait with the rest of the colony
79. Ants* carry the bait back to the colony/nest to kill the queen and other ants before they invade your home
80. Ants* carry the bait back to the colony/nest to kill the queen before they invade your home
81. Ants* eat and share the insecticide with the nest, killing themselves and the rest of the colony
82. Ants* eat and share the insecticide with their colony, killing themselves and the rest of the colony
83. Ants* eat the bait and die in the nest
84. Ants* eat the gel bait and die in the nest
85. Ants* eat the insecticide bait and die in the nest
86. Ants* eat the insecticide gel bait and die in the nest
87. Appealing Sugar formula
88. Appealing Sugar formula - fast attractant
89. Attractive Sugar formula
90. Attractive Sugar formula - fast attractant
91. [Attractive] Tri- Sugar formula
92. Attractive Tri- Sugar formula attracts ants* quick
93. Attractive tri-sugar blend that ants* seek
94. Attractive tri-sugar blend that ants* want
95. Attractive tri-sugar combo that ants* seek
96. Attractive tri-sugar combo that ants* want
97. Attractive Tri-Sugar formula attracts ants* fast
98. Attractive tri-sugar mix that ants* seek
99. Attractive tri-sugar mix that ants* want
100. Attracts ants* quickly
101. Attracts Ants*
102. Attracts quickly
103. Bait that lures them in with its sweetness only to provide them and their little friends with a deadly insecticide.
104. COMBAT®'s ant* killing bait stations
105. COMBAT®'s insecticide bait stations
106. COMBAT®'s potent ant* killing bait stations
107. COMBAT®'s potent insecticide bait stations
108. Contains a tri-sugar system
109. Contains appealing sugars
110. Contains appealing sugars which provides high ant* attraction power
111. Contains attractive sugars that ants* seek

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112. Contains attractive sugars that ants* want
113. Contains Attractive Sugars
114. Contains powerful sugars
115. Contains powerful sugars that ants* seek
116. Contains powerful sugars that ants* want
117. Contains powerful sugars which provides high ant* attraction power
118. Contains tri-sugars
119. Domino Effect
120. Eat, Share, Die
121. Effective against Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, [and] Little Black Ants
122. Effective against common household ants*
123. Effective Killing for up to 1 month
124. Control in 3-5 days
125. Control in as little as 3-5 days
126. Food and water formula/formulation attracts foraging ants to the [bait] stations
127. Food and water formula/formulation attracts worker ants to the [bait] stations
128. Foraging ants* are attracted to the [gel] bait and take it back to their nest/colony, killing the queen
129. Foraging ants* are attracted to the gel [bait] and take it back to their nest/colony, killing the queen and the whole colony/nest
130. Foraging ants* are attracted to the gel [bait] and take it back to their nest/colony, ultimately killing the queen and the whole colony/nest
131. Formula with a tri-sugar system
132. Formula with appealing sugars
133. Formula with appealing sugars which provides high ant* attraction power
134. Formula with Attractive Sugars
135. Formula with attractive sugars that ants* seek
136. Formula with attractive sugars that ants* want
137. Formula with powerful sugars
138. Formula with powerful sugars that ants* seek
139. Formula with powerful sugars that ants* want
140. Formula with powerful sugars which provides high ant* attraction power
141. Formula with Sugar
142. Formula with Sugars
143. Formula with tri-sugars
144. Formulation based on appealing Tri-sugars
145. Formulation based on appealing Tri-sugars and other food ingredients
146. Formulation based on Tri-sugars
147. Formulation based on Tri-sugars and other food ingredients
148. Gain control of your ant* problem
149. Gel Ant Bait

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150. Gets to the source of the ant* problem
151. Gets to the source of the problem
152. Gets to the source of your ant* problem
153. Gets to the source of your problem
154. Ants* love Combat®
155. High Palatability
156. Insecticide
157. It even kills ants* you don't see
158. It even kills ants* you don't see outside (adjacent to the home)
159. Keeps killing ants for up to 1 month
160. Keeps killing ants* until the bait is gone
161. Keeps killing ants* up to 1 month
162. Keeps killing until the bait is gone
163. Keeps working for up to 1 month
164. Keeps working until the bait is gone
165. Keeps working up to 1 month
166. Kill ants* 24/7
167. Kill ants* in inaccessible areas
168. Kill ants* in inaccessible places
169. Keeps on killing for up to 1 month
170. Kill the colony
171. Kill the nest
172. Kill the ones you see and the ones you don't
173. Kill the ones you see and the ones you don't see
174. Kills ants* in inaccessible areas
175. Kills ants* in inaccessible places
176. Kills ants*
177. Kills ants* 24/7 for up to 1 month
178. Kills ants* continuously
179. Kills ants* continuously for up to 1 month
180. Kills ants* for up to 1 month
181. Kills ants* in hard-to-reach areas
182. Kills ants* in hard-to-reach places
183. Kills ants* non-stop for up to 1 month
184. Kills ants* while you sleep
185. Kills ants* you don't see
186. Kills ants* you don't see outside (adjacent to the home)
187. Kills common household ants*
188. Kills all common household ants*
189. Kills in 24 hours
190. Kills in 24 hours and for up to 1 month

191. Kills in 24 hours and lasts up to 1 month
192. Kills non-stop
193. Kills non-stop - for up to 1 month
194. Kills the colony
195. Kills the nest
196. Kills the Queen
197. Kills within 24 hours
198. Kills within 24 hours and for up to 1 month
199. Kills within 24 hours and lasts up to 1 month
200. Long residual action
201. Long residual action for up to 1 month
202. Non-stop ant* control
203. Ongoing ant* control
204. Provides 24/7 ant* protection for up to 1 month
205. Provides 24/7 ant* protection
206. Provides 24/7 protection
207. Provides control of ants*
208. Provides round the clock protection
209. Provides round the clock protection for up to 1 month
210. Starts killing overnight
211. Starts working as soon as ants* feed on bait
212. Sugar boost formula contains three [types of] sugars which provides ants* with energy
213. Sugar boost power contains three [types of] sugars which provides energy
214. Sugar formula - fast attractant
215. Sugary Formulation
216. Sweet Tri-sugar formula that is highly attractive
217. Sweet Tri-sugar formula that is highly attractive to ants*
218. The gel [bait] attracts ants* in search of food and water to the bait
219. The gel [bait] attracts ants* in search of food and water to the station
220. The bait attracts ants* in search of food with its sugar formula/formulation
221. The bait attracts ants* in search of food with its sugar technology
222. The bait attracts ants* quickly in search of food with its sugar formula[tion]
223. The bait attracts ants* quickly in search of food with its sugar technology
224. The bait attracts ants* quickly in search of food with its Tri-sugar formula[tion]
225. The bait attracts ants* quickly in search of food with its Tri-sugar technology
226. The bait attracts ants* with its sugar formula/formulation
227. The bait attracts ants* with its sugar technology
228. The bait attracts ants* with its Tri-sugar formula/formulation
229. The bait attracts ants* with its Tri-sugar technology
230. The Domino Effect™
231. The gel attract ants* quickly

232. The gel attracts ant* quickly in search of food
233. The gel attracts ants*
234. The gel bait attracts ant* quickly in search of food
235. The gel bait attracts ants* quickly
236. The gel bait formulation attracts ants* quickly
237. The gel bait formulation attracts ants* quickly in search of food
238. The Nest Killer
239. This product has [a] [specific] [combination of] ant food attractants
240. This product kills ants* at the source
241. This product kills ants* at their source
242. This product kills ants* in the colony
243. This product kills ants* in the nest
244. This product kills ants* indoor and outdoor (adjacent to the home)
245. This product kills ants* indoors and outdoors (adjacent to the home)
246. This product kills ants* outdoor (adjacent to the home)
247. This product kills ants* where they breed
248. This product kills ants* where they hide
249. This product kills ants* where they live
250. This product kills ants* where they nest
251. This product kills ants* where you can't see them
252. This product kills ants* you can't see
253. This product kills ants* you don't see
254. This product kills ants*, the queen and the colony
255. This product kills the nest
256. This product kills the colony
257. This product kills the queen and the colony
258. This product kills the queen and the nest
259. This product offers ants food and water [source]
260. This product provides complete ant* control
261. This product[s] [patented action formula] kills ants*
262. Three/3 Sugars ants love to death
263. Tri-sugar formula that is highly attractive
264. Tri-sugar formula that is highly attractive to ants*
265. Visible results overnight
266. Worker ants* are attracted to the [gel] bait and take it back to the nest/colony, killing the queen
267. Worker ants* are attracted to the gel [bait] and take it back to the nest/colony, killing the queen and the whole colony/nest
268. Worker ants* are attracted to the gel [bait] and take it back to the nest/colony, ultimately killing the queen and the whole colony/nest
269. Your secret weapon against ants*

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

270. The benefit of gel [bait] efficacy in a no-mess bait station

*Excluding carpenter, fire, pharaoh and harvester ants.

Value claims:

- Trial Size
- Value Size
- Trial Pack
- Ant Bait Trial Pack
- New Size
- New Bait Count
- 2-Pack
- For small infestations only
- For small ant* infestations only
- For minor infestations only
- For minor ant* infestations only
- Recommended for small homes
- Recommended for apartments
- Recommended for small homes or apartments
- Perfect for apartments
- Perfect for apartments with a minor infestation
- Perfect for apartments with a minor ant* infestation
- Perfect for apartments with a small infestation
- Perfect for apartments with a small ant* infestation
- Perfect for small homes
- Perfect for small homes with a minor infestation
- Perfect for small homes with a minor ant* infestation
- Perfect for small homes with a small infestation
- Perfect for small homes with a small infestation
- Perfect for a small home with a minor infestation
- Perfect for a small home with a minor ant* infestation
- Perfect for a small home with a small infestation
- Perfect for a small home with a small infestation
- Recommended for small infestations
- Recommended for small ant* infestations
- Recommended for minor infestations
- Recommended for minor ant* infestations
- Use all baits, larger infestations may require more bait stations.
- Use all baits, larger infestations may require more than one box.
- Moderate ant problems may require 2 boxes [or more].
- Moderate or severe ant problems may require 2 boxes [or more].
- Number of bait stations needed varies depending on the size of the infestation.
- [x] [x [Bait]] [[x%] More†† [With Purchase]
- [x%] for free†† [With Purchase]

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Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 14 of 15

Date: December 5, 2016

- [X][Extra] [Free] [Bonus] [Bait(s)]†† [With Purchase] †† [for free]
- More Baits [- Better Value]
- Value Pack [- More Baits]
- Value Size [- More Baits]
- Bonus Pack
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack
††vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

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

Combat Vulcano AG
EPA Reg. No. 64240-71
Master Label
Page 15 of 15

Date: December 5, 2016

UNIT LABEL

COMBAT® Vulcano AG

[THIS SIDE DOWN [OR AGAINST SURFACE]]

[NOTE: Do not remove or puncture this label.]

KEEP OUT OF REACH OF CHILDREN

CAUTION: See [outer carton] [box] for complete directions and precautions.

Active Ingredient: Fipronil 0.001%

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

[Manufactured for] [Distributed by] [&] © [year] [Combat Insect Control Systems]
[7201E. Henkel Way, Scottsdale, AZ 85255]
[MADE IN [USA][KOREA][ITALY]]

EPA Reg. No. 64240-XX EPA Est. No.

NET WT. [XXXoz (Xg)]