

9404-94

5/1/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 1, 2009

H.R. McLane
Agent for Sunniland Corporation
7210 Red Road, Suite 206D
Miami, FL 33143

Subject: Amendment – Adding additional Use directions
Sunniland XX-X-X Lawn Food with 069% Bifenthrin Insecticide
EPA Reg. No. 9404-94
Your submission dated August 27, 2008

Dear Dr. McLane:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Replace "Wash thoroughly with soap and water after handling" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco" in the *Precautionary Statements* section.
2. As required in the Agency's Notice of Pesticide Registration (dated 11/23/05) revise the as follows:
 - a. Delete "Ticks and Chiggers" from Lawn Application table. These pests are not listed on the me-too label.
 - b. Delete "Non-Restricted use" from the statement beginning "This is a double action Non-Restricted use product". This is considered an implied safety claim and is not acceptable.
 - c. Under Directions for Use revise the "Not for use on Golf Course ... etc." sentence to read "Not for use on turf being grown for sale or other commercial uses on golf

courses, sod farms, nurseries ... etc.”

- d. You indicate Lawn and Perimeter Applications but give instructions only for perimeter applications. Following the first sentence under Lawn and Perimeter applications add, “For overall lawn application broadcast this product with suitable application equipment to ensure uniform coverage over the treatment area”.
 - e. This product is not labeled for individual fire ant mound treatment. Therefore following the first sentence under Imported Fire Ants add, “For controlling fire ant mounds use a pesticide registered and approved for treating individual fire ant mounds”
3. The Agency also required that you submit an one year storage stability study for this product under warehouse conditions along with a corrosion characteristics study. We recommend that observation be made at 0, 3, 6, 9, and 12 months intervals in the storage stability study.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions regarding this action, please contact BeWanda Alexander at (703) 305-7460.

Sincerely,



Richard Gebken
Interim Product Manager 13
Insecticide Branch
Registration Division (7505P)

Enclosure

Sunniland XX-X-X Lawn Food with 069% Bifenthrin Insecticide

with COMMENTS Label Unit 1 of 1
 EPA Letter Dated
 MAY 1 2009

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This is a double action Non-Restricted use product containing Lawn Food and Bifenthrin Insecticide for application by homeowners or licensed pesticide applicators for control of common lawn insects such as: Ants (including Imported Fire Ants), Mole Crickets, Sod Webworms, Chinch Bugs and other Pests as listed. For Lawns, in Landscape areas, around Residential, Commercial, Institutional, Public, and Industrial Buildings, Parks, Recreational Lawns, and Athletic Fields.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 9404-94

PR NOTICE 2007-4 & FLORIDA ONLY
 COPY: NOTIFICATION VERSION

EPA Reg. No. 9404-94 EPA Est. No. 9404-FL-1 U.S. Patent No. 4,238-505

Active ingredient:
 Bifenthrin* CAS[83322-82657] - 0.069%
 Other ingredients: - - - - 99.931%
 Total 100.000%

*Cis. isomers 97% minimum; trans. isomers 3% maximum.

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

See other panels for Additional Precautionary Statements.

FIRST AID

Have this container or label with you when calling a Poison Control Center or doctor, or when going for treatment.

IF SWALLOWED - Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES - Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

You may also call 1-800-858-7378 for emergency medical treatment advice.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift and runoff from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply more than 580 lbs. of this product per acre, per year. Not for use on Golf Courses, Sod Farms, nurseries, Commercial Greenhouses, or for commercial seed production, or for research purposes.

*** Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn / garden and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn / garden. (*Applies to FLORIDA only.)**

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE:** Store product in its original container in a cool, dry, locked place out of reach of children.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Commercial

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned stay out of smoke. Homeowner

CONTAINER DISPOSAL: IF EMPTY: Nonrefillable bag. Do not reuse or refill this bag. Place in trash or offer for recycling if available. **IF PARTLY FILLED:** Use as directed or call your local waste agency or 1-800 CLEANUP for disposal instructions. Never place unused product down any drain. 06-27-08

contents of this 17 lb. bag Feeds & Treats up to 5,000 sq.ft.
 contents of this 34 lb. bag Treats up to 10,000 sq.ft.
 contents of this 50 lb. bag Feeds & Treats up to 15,000 sq.ft.

LAWN AND PERIMETER APPLICATIONS

To prevent and reduce insect entry to homes and businesses apply a 6 to 10 foot wide band to the lawn areas around and adjacent to the structure. Observe and apply the following application rates.

LAWN APPLICATION

Apply 3.3 lbs. per 1,000 sq.ft.

*Annual Bluegrass,
 Weevils (Hyperodes Adult)
 Armyworms,
 Billbugs (Adult),
 Black Turfgrass
 Ataenius (Adult),
 Cutworms,
 Mealybugs,
 Sod Webworms,



**Apply 6.6 lbs. per 1,000 sq.ft.

**Ants,
 ***Centipedes,
 *Fire Ants,
 ***Fleas,
 Leafhoppers,
 ***Millipedes,
 ***Mole Crickets,
 ***Chinch Bugs,
 ***Ticks and Chiggers



*Imported Fire Ants control will be optimized by combining broadcast application that will control foraging workers and newly mated (fly-in) queens with mound treatments that will minimize existing colonies. The highest rate 6.6 lbs. per 1,000 sq.ft., may be required for control of Ants, Centipedes, Chinch Bugs, Fleas, Imported Fire Ants, Millipedes and Mole Crickets.

OPTIONAL TEXT WHEN MARKETED IN THE STATE OF NEW YORK. In New York State this product may not be applied to any grass or turfgrass within 100 ft. of a water body (lake, pond, river, stream, wetland, drainage ditch). In New York State do not make a single repeat application if there are signs of renewed insect activity, but not sooner than 2 weeks after the first application.

Spreader Setting Suggestions

The spreader settings below are approximate. Age and conditions of spreader and walking speed can cause variation in application rate. Use your spreader manual to properly calibrate your spreader with each application. Use the suggested settings chart below. Fill spreader on a hard surface to eliminate the chance of spillage on the lawn. Close spreader hopper when stopping or turning.

DROP SPREADERS:

Yard Star 75350..... XX-; Precision FH22.....XX;
 Republic EZ 7XX; Scotts Acugreen ... XX

BROADCAST SPREADERS:

yard Star 75450XX; Precision SB50P.....XX;
 Republic EZ GROW 75450.....XX;
 Scotts Easygreen 745 .XX; Scotts Speedygreen 740 XX

GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N) - - - - Variable XX%
 variable XX% Ammoniacal Nitrogen
 variable XX% Water Soluble Nitrogen
 variable XX% water Insoluble Nitrogen
 Available Phosphate (P₂O₅) Variable XX%
 Available Potash (K₂O) Variable XX%

plant Nutrients derived from Diammonium Phosphate, Urea formaldehyde, Urea, Sulfate of Ammonia, Sulfur coated Urea, Sulfate of Potash, Magnesium, Statement of Secondary Plant Nutrients, 01-19-05

WARRANTY NOTICE : Buyer and user assume all risk and liability of use, storage and/or handling of this product not in accordance with the terms of this label.

Product Batch Code No. _____

SUNNILAND CORPORATION
 P. O. BOX 8001 - SANFORD, FL 32772

Net Weight 17 Pounds
 34 pounds
 50 Pounds