

53883-127

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 14 2006

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Joe Blake
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: Amendment to Modify Label Wording Due to Copyright Infringement Litigation

Bifenthrin Fire Ant Killer
EPA Registration No. 53883-127
Your submission dated April 20, 2006

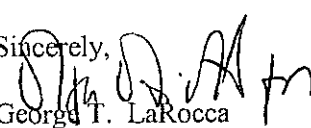
Dear Mr. Blake:

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. On the front panel seventh bullet, replace "entire yard" with "treated area".
2. Capitalize the heading "Directions for Use" and change the type to the same used for the heading Environmental Hazards.
3. Change the application rate for mound treatments from 1/2 cup per mound to 1 cup per mound throughout the label.
4. On page 2 change "Impose Fire Ant Killer" to "Bifenthrin Fire Ant Killer".

If you have any questions regarding this action, please contact Olga Odiott at (703) 308-9369.

Sincerely,


George T. LaRocca

Product Manager 13

Insecticide Branch

Registration Division (7505C)

Enclosure

Bifenthrin Fire Ant Killer (ALT. Name Surrender® Brand Impose Fire Ant Killer)

For residential lawn use only

- **Bifenthrin Fire Ant Killer** is intended to be used outdoors in such areas as around flower gardens, flower beds, around/along perimeters & foundations of houses, garages, sheds and structures, around mulch beds, along fence lines, and around decks and decking and other areas where ants are a problem.
- 11.48 lb (5.20 kg) covers up to 5000 sq. ft. *[optional marketing statements]*
- 7 lb (3.17 kg) covers up to 3048 sq. ft. *[optional marketing statements]*
- 3.5 lb (1.5 kg) covers up to 1524 sq. ft. *[optional marketing statements]*
- Kills the queen in 24 hours *[optional marketing statements]*
- 4 Month Fire Ant Control *[optional marketing statements]*
- Protects the entire yard for up to 4 months *[optional marketing statements]*
- Stops and prevents Fire Ant Mound formation *[optional marketing statements]*
- Prevents new Fire Ant mounds from forming for up to 4 months *[optional marketing statements]*
- Penetrates down to where fire ants forage *[optional marketing statements]*
- Fast Acting *[optional marketing statements]*
- Kills on Contact *[optional marketing statements]*
- Ready-to-Use *[optional marketing statements]*
- Kills fly-in Queens *[optional marketing statements]*
- Kills Fire Ants and other listed ants *[optional marketing statements]*
- Apply twice for season long control *[optional marketing statements]*

Active Ingredient

Bifenthrin*	0.20%
Other Ingredients:	99.80%
Total	100.00%

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

KEEP OUT OF REACH OF CHILDREN CAUTION

See back/side panels for precautionary statements and directions for use.

Net Contents _____

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

JUN 14 2006
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing.

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

SKIN OR CLOTHING

- 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.

You may also contact SafetyCall® (866) 897-8050 for emergency medical treatment information.

Note To Physician: This product is a pyrethroid. If large amounts have been ingested, milk, cream, and other digestible fats and oils may increase absorption and so should be avoided.

ENVIRONMENTAL HAZARDS

This pesticide product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

Product Facts:

- Kills Fire Ants and other listed ants.
- For use on residential lawn areas.
- Apply one 1/2 cup per mound.

How and when to Apply *[optional marketing language]*

For Best Results *[optional marketing language]*

Directions for use:

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

For extended fire ant control and prevention, apply Bifenthrin Fire Ant Killer two times per year:

Spring: March-May **Late Summer:** August- September

Amount to Use: Broadcast Application with Spreader

Bifenthrin Fire Ant Killer should be applied when insects first appear. A uniform application is most desirable and is best achieved by spreading half the required amount of product over the area and then applying the remaining half with swaths at right angles to the first. For best results, apply during the morning or late evening when it is cool and the ants are most active. Do not treat just the infested areas of the lawn where mounds are visible. Treat the entire lawn area to prevent re-infestation of ants from neighboring areas. A thorough irrigation of the treated area, immediately after application will provide best results.

Important Note: Combining broadcast applications to control foraging workers and newly mated fly-in queens with mound treatments to existing colonies will provide best results.

Amount to Use: Mound Application

Mounds should be treated by applying 1/2 cup of Bifenthrin Fire Ant Killer per mound and then drenching the mound with 1 to 2 gallons of water. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four-foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65-80°F) or in early morning or late evening hours. This treatment will kill the queen within 24 hours of application.

Important: Food utensils such as teaspoons and measuring cups must not be used for food purposes after use with pesticides.

In New York State, this product may NOT be applied to any grass or turf area within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of Impose Fire Ant Killer if there are signs of renewed insect activity, but not sooner than two weeks after application.

Do not allow children or pets on to treated areas until granules have been watered into the soil and the grass or soil is dry.

[optional marketing language]

Spreader	Spreader Settings-	Directions
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	Covers 5,000 sq. ft. [Covers x,xxx sq. ft.]	
Scotts® AccuGreen Drop Spreaders	X	Mow lawn first if grass is tall enough to touch the bottom of the spreader mow the lawn. First apply two header strips. Operate spreader the longest way of the lawn. To ensure uniform coverage overlap wheel marks. Shut off spreader when you have reached the header strips or stopped.
Scotts® EasyGreen® Rotary Spreader	XX	Slide shut-off lever to the right; application automatically starts and stops when you do. For complete coverage make each pass about 30 inches from the previous one so some overlapping occurs.
Scotts® SpeedyGreen® Rotary Spreader	X	Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one, so some overlapping occurs. Avoid applying this product on vegetables.

Additional Spreader Settings

(Spreader settings are approximate. Adjustment may be needed for proper coverage.)

EZ Drop, Republic (#530)	(X)
EZ Broadcast, Republic (#540)	(X)
Scotts® Handy Green® II	(X)
Scotts® Easy™ Hand Held Spreader	(X)
ORTHO® Whirlybird® Multipurpose Spreader	(X)

Bifenthrin Fire Ant Killer kills the following types of ants:

- Fire Ants
- Argentine Ants
- Carpenter Ants
- Odorous Ants
- Pyramid Ants
- Pavement Ants
- Pharaoh (sugar) Ants
- Red Harvester Ants

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in cool, dry area away from children and domestic animals.

Disposal: If empty: Do not reuse this container. Do not rinse unless required for recycling. Place in trash. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Unless otherwise instructed, place in trash. Never pour unused product down the drain or on the ground.

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041
EPA Reg. No. 53883 -127
EPA Est. No. 53883-XXX

WARRANTY STATEMENT

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

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