

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

May 22, 2008

Jane M. Miller, Agent to Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, Texas 77507

 Subject: Follow-up to Agency Approved Amendments (Main and Supplemental Labeling) per Agency's letters dated March 11, 2008
 Lambda LP Soil & Turf Insect Killer Granules
 EPA Reg. Nos. 53883-195
 Your submission/email dated April 07, 2008

Dear Ms. Miller:

Upon further review of the above referenced submission, the Agency accepts the inclusion on the main and supplemental labels, references to, and use instructions for "fire ants" and "red imported fire ants". See enclosed stamped labels for your records.

With reference to our letters of March 11, 2008, please submit a formulators' exception statement; this form is required with amendment to add new sites/pests. Also, with the exception of the accepted claims and references to fire ants and red imported fire ants in the aforementioned letters, revise the main and supplemental labeling for this product accordingly and submit final printed labels to the Agency prior to releasing the product for shipment. If you have any questions please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerel

George T. LaRocca, Product Manager 13 Insecticide Branch Registration Division (7505P)

Lambda LP

Soil & Turf Insect Killer Granules

[alt. name: Cyonara LP Lawn & Perimeter Insect Control Granules]

For Use around buildings and structures for the control of listed pests, including on lawns, around ornamental trees and shrubs, around residential, institutional, public, commercial, agricultural and industrial buildings; and parks, recreational areas, athletic fields, and similar type areas.

[Optional Marketing Statements -

- 10 pounds treats up to 5,000 sq. ft.
- Kills in 24 hours
- Kills [Controls] many types of insects, including ants, fleas, chinch bugs & grubs •
- Broadcast with spreader
- Resealable Bag •
- For Perimeter Treatment Around Your House Foundation •
- .
- Convenient Shaker Bag
- No Spreader
- Controls Chinch Bugs, Ticks, and Fleas
- Controls 30+ insects
- Use on lawns and as a perimeter treatment around your house foundation]

ACCEPTED with COMMENTS In EPA Letter Dated:

MAY 2 2 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act, mended, for the pesticide registered under EPA Reg. No.

- Kills Ants, Cockroaches, Fleas, Ticks and other listed insects

Active Ingredient:

Lambda-cyhalothrin	
•	

Net Weight

KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION

Si usted no entiende la etiqueta, busque a alguien pars que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

Have the produce going for treatment at (86	FIRST AID of container or label with you when calling a poison control center or doctor, or ent. You may also contact SafetyCall® International for emergency medical 6) 897-8050.
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 do so 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 15-20 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.

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION - Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly after handling and before eating or smoking. Food utensils such as spoons or measuring cups must not be used for food purposes after use in measuring pesticides.

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish and aquatic vertebrates. Do not apply directly to water.

READ ENTIRE LABEL BEFORE USE

DIRECTIONS FOR USE

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

Keep children and pets off treated area until product has been watered in and lawn is dry.

Restrictions:

• Do not apply this product to edible growing crops or stored raw agricultural commodities used for food or feed.

• Do not allow applications to contact water inhabited by fish, such as in ornamental fish ponds that are located around structures being treated.

• Do not apply this product by aerial application.

• Use of this pesticide adjacent to water may affect aquatic organisms. To protect these organisms, do not apply this pesticide within 25 ft. of lakes, reservoirs, rivers, permanent streams, marches or natural ponds, estuaries, and commercial fish farm ponds.

• In New York State, this product may not be applied within 100 feet of a coastal marsh, or stream that drains directly into a coastal marsh.

Observe all restrictions and precautions which appear on the labels of these products.

• Do not apply more than 0.36 lbs. of the a.i. (800 pounds of Lambda LP) per acre per year.

IMPORTANT: Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, outdoor ornamental gardens or parks, or on lawns or grounds.

GENERAL INFORMATION

LAWN AND PERIMETER PEST CONTROL

Lambda LP insecticide may be used for applications to maintain interior plantscapes or outdoor areas where turf and ornamental ground covers are grown such as residential landscaped areas and non residential landscapes around institutional, public, commercial and institutional buildings, parks, recreational areas, and athletic fields. Broadcast Lambda LP Insecticide with suitable application equipment to ensure uniform coverage over the treatment area. The application rates listed in the Lawn and Perimeter Use Rate table will provide excellent control of the respective pests under typical conditions.

NOTE:

• Use higher rate for longer length of control.

Watering (irrigation or rainfall) following application will dissolve the granules and release the insecticide.
Make no more than 6 general applications per year. More frequent treatments should be limited to spot treatments.

• Uniform coverage is necessary to provide the most effective level of control.

• Consult your state university or local Cooperative Extension Service office for specific pest control application timing in your area.

• Application to turf should be started prior to the establishment of high insect pest populations and significant turf damage. Make reapplications as necessary to keep pest populations under control, using higher rates as pest pressure increases.

	PEST	A.I. Ib per acre	Lambda LP Rate Per 1000 ft2	Lambda LP Rate Per Acre
Band Treatment Around Foundation	Ants Beetles Crickets Earwigs	0.04-0.06	2 - 3 lbs.	88 - 131 lbs.
	Firebrats Millipedes Mites Silverfish Sowbugs			
Overall Lawn Application	Ants Armyworms Centipedes	0.04-0.06	2 - 3 lbs.	88 – 131 lbs.
	Crickets Cutworks Earwigs Grasshoppers Green June Beetles		- -	
	Japanese Beetle (Adult) Leafhoppers Millipedes Mites			
	Pillbugs Sod webworms Spider Mites (Twospotted, Spruce) Spittlebugs Springtails		•	
	and Ticks (including Ticks which may transmit Lyme Disease)			
Overall Lawn Application	Billbugs Chinch Bugs Dung beetles* Green June beetle grubs*	0.06-0.078	3 - 4 lbs	131 - 176 lbs.
	Hyperodes weevils Japanese beetle grubs* Mole Crickets			
Spot Treatment	Ants		Apply 1-2 teaspoons around each ant hill	

Recommended Application Rates for Lawn and Perimeter Use Rate



Fire Ants	·· .	Mound Treatment:	
		Apply ½ cup over,	
		and 2 ft. around	
		each fire ant	
		mound	

* Suppression only.

SPECIFIC USE INSTRUCTIONS Treatment Around Foundations

Around house foundation to control pests normally found around or near foundations of houses, as well as in lawns, and certain of these pests that may enter houses.

Pests	Use Rate	Use Instructions
Ants (Argentine, Southern,	Apply at the rate of	Apply a 3 to 10 foot band of granules next to
Field, Allegheny Mound,	2 lb to 3 lb per 1,000 sq. ft.	the house foundation and completely distribute
Florida Carpenter, Black	(an area 5' x 200') oz.	the granules. Water lightly immediately
Carpenter, Cornfield, Honey,	or	following application.
Pavement, Red Imported	3.2 oz. to 4.8 oz. per 100 sq. ft.	
Fire Ant, Nuisance),	(10' x 10').	Treat when insects first appear or when you
Fleas		notice lawn damage.
Roaches (German and		·
American),		For best results, leaf litter and debris should be
Palmetto bugs	· · ·	removed from the foundation area. Branches
Waterbugs		and vegetation that touch the foundation should
Millipedes		be cut back. Other potential pest harborage
Mites		sites, such as deep mulch, should be raked
Silverfish		away before application.
Sowbugs (Pillbugs)		
Crickets		
Earwigs		

Overall Lawn Application

Pests	Use Rate	Use Instructions
Ants (Argentine, Southern, Field, Allegheny Mound, Florida Carpenter, Black Carpenter, Cornfield, Honey, Pavement, Red Imported Fire Ant,	Apply at the rate of 2 lb to 3 lb per 1,000 sq. ft. (an area 20' x 50')	Apply with a fertilizer spreader (see spreader setting chart). Apply when grass is dry and water the lawn lightly immediately following application.
Nuisance)	or	Treat when insects first appear or when you
Armyworms (Fall & Yellow-striped)	3.2 oz. to 4.8 oz.	notice lawn damage.
Centipedes	per 100 sq. ft.	neuse lawin danlage.
European Crane Flies	(10' x 10').	
Crickets		
Cutworms		
Earwigs		
Fleas		
Lawn moths (sod webworms)		
Grasshoppers		
Japanese beetle (adults)		· · ·
Pillbugs Spittle bugs		
Mites		
Green June Beetles		
Leafhoppers		
Millipedes		
Springtails and Ticks		
(including Ticks which may transmit		
Lyme Disease)		

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Label Amendment 12/1/07 Add lawn & perimeter uses %/11

Billbugs Grubs (Japanese beetle grubs, Green June Beetle Grubs)	Apply 3 lb. per 1,000 sq. ft. of lawn.	Water grass completely immediately following application.
Ataenuis spretulus (dung beetles) Hyperodes Weevils Mole Crickets		Treat when insects first appear or when you notice lawn damage.
Chinch bugs		For hyperodes weevils, apply in April-May.
		For billbug control , apply in May when activity is first observed or when chewed or brown grass indicates damage from these insects.
		For grub control, except on dung beetle, treat any time between late July and early October.
		For dung beetle grub control , apply in early spring or early summer (March-July) when damage is first noticed. Immediately following application, completely water grass with 1/4 to 1/2 inch of water. If a second generation occurs, treat again in late summer or early fall.
		For chinch bug control, apply at higher rates during the summer when both nymphs and adults may be present.
		For mole crickets apply in the early spring for control of adults when actively invading grass areas. If the soil is dry, water before application to bring mole crickets closer to the surface and in contact with the granules. Apply late in the day and water in following application. For control of early nymphal stages, apply at the time of peak egg hatch. As the nymphs mature, higher rates may be necessary.

Spot Treatment

Pests	Use Rate	Use Instructions
Ants (Argentine, Southern, Field,	Mound Treatment:	Water lightly immediately following
Allegheny Mound, Florida Carpenter,	Apply 1-2 teaspoons over	application.
Black Carpenter, Cornfield, Honey,	and around each ant hill.	
Pavement, Red Imported Fire Ant,		NOTE: Use both broadcast and spot
Nuisance)	· · ·	treatment for difficult to large ant
		infestations. If soil is dry, water lightly
	·	before application to bring the ants closer to
		the surface for better control.
Fire Ants	Mound Treatment:	Immediately following application, water in
	Apply ½ cup over, and 2 ft.	completely. Apply a minimum of 1 gallon of
	around, each fire ant mound.	water to each mound area. To prevent the
		disturbance of ants, water gently. Use of
· · ·		high pressure watering equipment may
· · ·		disturb the ants and cause migration,
		reducing product effectiveness. NOTE: For
		best results, apply in cool weather, 65°-80°
		F, or in early morning or late evening hours.
		Treat new mounds as they appear. Fast
		acting. Works within 24 hours.

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Spreader Settings for Lawn Application

[INSERT SPREADER SETTING CHART]

EPA Reg. No. 53883-195

NOTE: The spreader settings stated are approximate. Precisely weigh a few pounds into your spreader and apply to a measured area. To assure correct rate of application, adjust spreader settings if needed.

STORAGE AND DISPOSAL

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

Storage: Reclose container tightly after each use. Store in a cool, dry area which is inaccessible to children and pets.

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

Container Disposal: Paper and plastic bags: completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by other procedures allowed by state and local authorities.

WARRANTY STATEMENT

CONTROL SOLUTIONS, INC. warrants that this product conforms to the chemical description on the label and is reasonably fit for purposes stated in the Directions for Use when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or CONTROL SOLUTIONS, INC., and Buyer and User assume the risk of any such use.

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

EPA Est. No. xxxxxx-xx-xxx

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR **LAMBDA LP** BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using **LAMBDA LP** as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the label provided with the pesticide container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

LAMBDA LP

Lawn & Perimeter Insect Control Granules

EPA Reg. No. 53883-195

ACCEPTED with COMMENTS In EPA Letter Dated:

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KEEP OUT OF REACH OF CHILDREN CAUTION/PRECAUCION MAY 2 2 2008 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

Si usted no entiende la etiqueta, busque a alguien pars que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

In case of an emergency with this product contact SafetyCall® International at (866) 897-8050.

DIRECTIONS FOR USE

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

This labeling must be in the possession of the user at the time of pesticide application.

Keep children and pets off treated area until product has been watered in and lawn is dry.

Restrictions:

• Do not apply this product to edible growing crops or stored raw agricultural commodities used for food or feed.

• Do not allow applications to contact water inhabited by fish, such as in ornamental fish ponds that are located around structures being treated.

Do not apply this product by aerial application.

• Use of this pesticide adjacent to water may affect aquatic organisms. To protect these organisms, do not apply this pesticide within 25 ft. of lakes, reservoirs, rivers, permanent streams, marches or natural ponds, estuaries, and commercial fish farm ponds.

• In New York State, this product may not be applied within 100 feet of a coastal marsh, or stream that drains directly into a coastal marsh.

Observe all restrictions and precautions which appear on the labels of these products.

Do not apply more than 0.36 lbs. of the a.i. (800 pounds of LAMBDA LP) per acre per year.

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GENERAL INFORMATION

LAWN AND PERIMETER PEST CONTROL

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NOTE:

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Watering (irrigation or rainfall) following application will dissolve the granules and release the insecticide.
Make no more than 6 general applications per year. More frequent treatments should be limited to spot treatments.

• Uniform coverage is necessary to provide the most effective level of control.

• Consult your state university or local Cooperative Extension Service office for specific pest control application timing in your area.

• Application to turf should be started prior to the establishment of high insect pest populations and significant turf damage. Make reapplications as necessary to keep pest populations under control, using higher rates as pest pressure increases.

Recommended Application Rates for Lawn and Perimeter Use

	PEST	A.I. Ib per acre	Lambda LP Rate Per 1000 ft2	Lambda LP Rate Per Acre
Band Treatment Around Foundation	AntsBeetlesCricketsEarwigsFirebratsMillipedesMitesSilverfishSowbugsSowbugs	0.04-0.06	2 - 3 lbs.	88 - 131 lbs.
Overall Lawn Application	Ants Armyworms Centipedes Crickets Cutworms Earwigs Grasshoppers Green June Beetles Japanese Beetle (Adult) Leafhoppers Millipedes Mites Pillbugs Sod webworms Spider Mites (Twospotted, Spruce) Spittlebugs Springtails and Ticks (including Ticks which may transmit Lyme Disease)	0.04-0.06	2 - 3 lbs.	88 – 131 lbs.

Overall Lawn Application	Billbugs Chinch Bugs Dung beetles* Green June beetle grubs* Hyperodes weevils Japanese beetle grubs* Mole Crickets	0.06-0.078	3 - 4 lbs	131 - 176 lbs.
Spot Treatment	Ants		Apply 1-2 teaspoons around each ant hill	
	Fire Ants		Mound Treatment: Apply ½ cup over, and 2 ft. around each fire ant mound	

*Suppression only.

SPECIFIC USE INSTRUCTIONS

Treatment Around Foundations

Pests Controlled: Ants (Argentine, Southern, Field, Allegheny Mound, Florida Carpenter, Black Carpenter, Cornfield, Honey, Pavement, Red Imported Fire Ant, Nuisance), Fleas, Roaches (German and American), Palmetto bugs, Waterbugs, Millipedes, Mites, Silverfish, Sowbugs (Pillbugs), Crickets, Earwigs

Application Rate: Apply at the rate of 2 lb to 3 lb per 1,000 sq. ft. (an area 5' x 200') oz. or 3.2 oz. to 4.8 oz. per 100 sq. ft. (10' x 10').

Application Instructions: For best results, leaf litter and debris should be removed from the foundation area. Branches and vegetation that touch the foundation should be cut back. Other potential pest harborage sites, such as deep mulch, should be raked away before application.

Overall Lawn Application

Chinch Bug and Mole Cricket Control -

For chinch bug control, apply at higher rates during the summer when both nymphs and adults may be present.

For **mole crickets** apply in the early spring for control of adults when actively invading grass areas. If the soil is dry, water before application to bring mole crickets closer to the surface and in contact with the granules. Apply late in the day and water in following application. For control of early nymphal stages, apply at the time of peak egg hatch. As the nymphs mature, higher rates may be necessary.

Spot Treatment

Pests Controlled: Ants (Argentine, Southern, Field, Allegheny Mound, Florida Carpenter, Black Carpenter, Cornfield, Honey, Pavement, Red Imported Fire Ant, Nuisance)

Mound Treatment: Apply 1-2 teaspoons over and around each ant hill.

NOTE: Use both broadcast and spot treatment for difficult to large ant infestations. If soil is dry, water lightly before application to bring the ants closer to the surface for better control.

STORAGE AND DISPOSAL

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

Storage: Reclose container tightly after each use. Store in a cool, dry area which is inaccessible to children and pets.

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

Container Disposal: Paper and plastic bags: completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by other procedures allowed by state and local authorities.

Read the "WARRANTY STATEMENT" on the label for Lambda LP before using. These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

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