

53883-230

03/14/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jane M. Miller
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

MAR 14 2008


Dear Ms. Miller:

Subject: Labeling Amendment; Additional Pests
IMI-Lambda G Insect Granules
EPA Registration No. 53883-230
Date Submitted: March 6, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1. On page 4 of the label revise the header "**General Directions**" to read "**Directions.**"
2. Delete the following claims:
 - "Kills over 40 types of insects [insect types] [as listed]"
 - "Kills 43 types of [lawn invading] [lawn damaging] insects [as listed]"
 - "Apply Once a Year"
 - "See results in minutes [in hours] [overnight]"
3. Delete all references to "season long" throughout the label. A season is not equivalent to 3 months and varies greatly between geographical locations.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely,

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

IMI-Lambda G INSECT GRANULES

For outdoor use around the home only.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

MAR 14 2008

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
53883-230**

Active Ingredient:	
Imidacloprid	0.5%
Lambda-Cyhalothrin	0.1%
Other Ingredients	99.4%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION. See back for additional precautionary statements.

Net Wt 10 lb (4.5 kg)



OPTIONAL PRODUCT FACT BOX

PRODUCT FACTS

What it Does:

Helps protect your home from invading Ants, except Carpenter and Pharaoh Ants. Also Kills Crickets, Fire Ants, Chinch Bugs, Armyworms (Fall and Yellow-striped), Billbugs, Cutworms, Earwigs, Fleas, Roaches (German & American), Grubs, Sod webworms, European Crane Flies, Ticks and other listed insects

Where to Use: (icon outdoors)

Outdoors, on Lawns and as a Band Treatment around House Foundation

Questions & Comments: (icon phone) (icon computer)

Call 1-800-XXX-XXX or visit our website at www.xxx.com

STOP. 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.

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

Three Easy Steps to Use this Product

- Step #1:** Determine size of the job, measure the area to be treated.
- Step #2:** Use spreader setting chart to determine appropriate setting for your spreader.
- Step #3:** Treat as directed in rate chart. Thorough coverage is important. Water in granules immediately after application.

Restrictions:

- Do not apply more than six (6) times per year per location at low use rate.
- Do not apply more than three (3) times per year per location at high use rate.
- Do not allow product to run off from target site or apply within 24 hours of rain

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Spreader Settings for Overall Lawn Application

Spreader Make and Model	0.8 lb/ 1000 sq ft	1.2 lb/ 1000 sq ft	2 lb/ 1000 sq ft
CYCLONE			
Rotary	xx	xx	xx
K-GRO			
Rotary	xx	xx	xx
Drop	xx	xx	xx
REPUBLIC			
EZ Drop #530	xx	xx	xx
EZ Drop #540	xx	xx	xx
SpeedyGreen 2000	xx	xx	xx
SpeedyGreen 3000	xx	xx	xx
AccuGreen 1000	xx	xx	xx
AccuGreen 2000	xx	xx	xx
AccuGreen 3000	xx	xx	xx
Drop	xx	xx	xx
SEARS			
Rotary	xx	xx	xx
Drop	xx	xx	xx
EARTHWAY			
Rotary	xx	xx	xx
PRECISION			
Rotary (#S850)	xx	xx	xx
RED DEVIL			
Rotary	xx	xx	xx
TRUE TEMPER			
Rotary	xx	xx	xx
Rotary	xx	xx	xx

Note: The spreader settings listed above are approximate. Accurately weigh a few pounds into your spreader and apply to a measured area. Then adjust spreader setting if necessary, in order to assure correct rate of application.

Treat the following pests during the months indicated. Make no more than 6 applications per year at low use rate or 3 times for highest use rate.

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
				Billbugs			Grubs				
				Dung beetle grubs							
				Hyperodes weevils							
Treat Ants (except Carpenter and Pharaoh Ants) and other insects when they first appear or you notice lawn damage.											

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DIRECTIONS FOR APPLYING IMI-LAMBDA G INSECT GRANULES

Treatment Areas	Pests	How To Use	Use Rate
Band Treatment Around House Foundation	Ants*, Fleas, Roaches (German and American), Palmetto bugs, Water bugs, Millipedes, Mites, Silverfish, Sowbugs (Pillbugs), Crickets, Earwigs	These pests are commonly found around or near foundations of houses as well as in lawns. Certain of these pests may enter houses. Apply a 3 to 5 foot band of granules next to the house foundation. Distribute granules uniformly. Water lightly immediately after application.	Apply at the rate of 0.8 lb per 1000 sq ft (an area 5' x 200')
Overall Lawn Application	Ants*, Armyworms (Fall & Yellow-striped), European Crane Flies, 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).	Apply with a fertilizer spreader. See spreader setting chart [on the side of bag]. Apply when grass is dry. Water lawn lightly immediately after application. For season long [up to 3 month] control of fire ants, apply at higher use rate.	Apply at the rate of 0.8 lb per 1000 sq ft (an area 20' by 50') For season long control of Fire Ants apply at the rate of 2 lb per 1000 sq ft (an area 20' x 50')
	Billbugs, Grubs (Japanese beetle grubs, Green June Beetle Grubs), <i>Ataenius spretulus</i> (dung beetles), Hyperodes Weevils, Mole Crickets, Chinch bugs	Immediately water grass thoroughly after application. <i>For billbug control</i> , apply when activity is first observed or when chewed or brown grass indicates damage from these insects. <i>For grub control</i> , except dung beetle, treat any time between late July and early October. <i>For dung beetle grub control</i> , apply in spring or early summer when damage is first noticed. Water grass thoroughly with ¼ to ½ inch of water immediately after application. Treat again in late summer or early fall if a second generation occurs. For control of mole crickets, apply prior to or during the peak egg hatch period.	Apply 1.2 lb to 1.8 lbs per 1000 sq ft of lawn.
Spot Treatment	Ants*	Water lightly immediately after application	Apply 0.5 teaspoons over and around each ant hill.

*Ants (Except Carpenter and Pharaoh): Argentine, Southern, Field, Allegheny Mound, Cornfield, Honey, Pavement, Red Imported Fire Ant, Nuisance

OPTIONAL DIRECTIONS FOR BAND TREATMENT

OPTION A

BAND TREATMENT AROUND HOUSE

General Directions

The following pests are commonly found around or near foundations of houses as well as in lawns. Some of these pests may enter the home. Apply a 3 to 5 foot band of granules next to the house's foundation.

INSECTS:

Ants (except Carpenter and Pharaoh), Mites, Crickets, Earwigs, Fleas, roaches (German & American), Palmetto bugs, water bugs Millipedes, Sowbugs (Pillbugs)

RATE:

1.25 oz for each 100 sq ft area (5' by 20').

HOW TO USE:

Distribute granules evenly. Water lightly immediately after application.

SPOT TREATMENT FOR ANTS

(Except Carpenter and Pharaoh Ants)

RATE:

Apply 0.5 teaspoons over and around each anthill.

HOW TO USE:

Water lightly immediately after application.

OPTION B

BAND TREATMENT AROUND HOUSE

1. IMI-Lambda G Insect Granules kills ants (except Carpenter and Pharaoh), as well as fleas, mites, crickets, earwigs, millipedes, roaches (German & American), Palmetto bugs, water bugs, sowbugs (Pillbugs), silverfish, ticks (including ticks which may transmit Lyme Disease) and other listed pests.
2. Break the seal and open the pop-top cap.
3. Evenly sprinkle granules in a 3 to 5 foot wide band along the foundation of your home. Granules should be spaced like the ones pictured below (show picture).
Use rate = 0.8 lb per 1000 sq ft (an area 5' x 200') or 1.25 oz for each 100 sq ft (an area 5' x 20').
4. Gently water treated areas.

USE TIPS

1. Try to get even coverage throughout your "band".
2. Reapply after hard rains to areas where down spouts empty.

SPOT TREATMENT FOR ANTS

(Except Carpenter and Pharaoh)

1. Evenly sprinkle granules over and around each anthill.
2. Apply (0.5 teaspoons) per anthill. [(NOTE: This package will effectively treat 64 anthills.) (The note is for a 2 lb package.)]
3. Gently water treated areas immediately after application.

STORAGE AND DISPOSAL

Storage: Reclose container tightly after each use. Store in a cool, dry area which is inaccessible to children and pets. **Disposal:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes, and gloves. Food utensils such as spoons or measuring cups must not be used for food purposes after use in measuring pesticides.

First Aid

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.

Have the product container or label with you when calling a Poison Control Center, doctor, or going for treatment. You may also contact SafetyCall® International (866) 897-8050 for emergency medical treatment information.

Environmental Hazards

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

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[*If you are not satisfied with this product for any reason send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.]

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

EPA Reg. No. 53883-230
EPA Est. No.

OPTIONAL MARKETING CLAIMS

[Works within [24] hours (no waiting for weeks) • Ready-to-use Granules • *Guaranteed [Results or Your Money Back] • Re-sealable bag • Kills in 24 hours • Low odor • No odor • Kills the mound [colony] • Starts to kill in minutes • Starts to kill in hours • Kills Ants (except Carpenter and Pharaoh), Crickets, Fleas, Grubs, Ticks [and other listed pests] • Kills Grubs [and lawn invading [damaging] Pests] • Kills on Contact • Controls many destructive lawn insects, including grubs • Kills Mole Crickets and Chinch Bugs • Kills Fire Ants • White grub control • Effective grub control • Kills insects above and below the ground [surface] • Use on lawns • Kills over 40 types of insects [insect types][as listed] • Kills 43 types of [lawn invading] [lawn damaging] insects [as listed] • Lasts for up to 3 months [12 weeks][all season long] against Red Imported Fire Ants • Keeps on Killing Red Imported Fire Ants for up to 3 months [12 weeks][all season long] • Protects your yard from Red Imported Fire Ants for up to 3 months [12 weeks] [all season long] • Kills fire ants and prevents new mound formation for up to 3 months [12 weeks][all season long] • Kills [Works on][Effective control of [against]] all types of listed lawn invading [lawn damaging] insects [pests] • Fast acting plus season long killing power [control] against Red Imported Fire Ants • Season long control against Red Imported Fire Ants • Starts to work immediately [in minutes], keeps working [lasts] all season [long] against Red Imported Fire Ants • See results in minutes [in hours] [overnight] • Limits new mound formation [mound movement] • [One

application] lasts all season [long] to control against Red Imported Fire Ants • [One Application] Lasts All Summer [Long] To Control Against Red Imported Fire Ants • Easy to Apply • Apply Once for Season Long Control Against Red Imported Fire Ants]

[large picture of a grub on the label]
[Include a picture of the grub life cycle]
[10 Pounds Treats 7000 Sq Ft]
[10 Pounds treats up to 8,300 Sq Ft]
[Controls Billbugs, Green June Beetles and Mole Crickets]
[Apply Once A Year]
[1 Application Provides Season Long Control]
[Apply anytime between Spring throughout Summer]
[Kills Grubs all Season long]
[For Control of Grubs and Listed Insects]
[Include a picture of any listed insects]
[<PRODUCT NAME> contains imidacloprid, the active ingredient used in <BRAND NAME>™ or ®.]
[<PRODUCT NAME> is not manufactured or distributed by <BASIC REGISTRANT / BRAND HOLDER>, seller of <BRAND>™ or ®.]
[<BRAND>™ or ® is a trademark of <TRADEMARK HOLDER>].
[Dual Action Formula with Two [2] Active Ingredients]
[Apply Once for Season Long Soil & Surface Insect Control]
[Two [2] Active Ingredients for Season Long Grub Control]
[3 Month] [Season Long] soil insect [protection] [control]
[3 Month] [Season Long] soil and surface insect [protection] [control]
[3 Month] [Season Long] Grub [and European Crane Fly] Control
[One step insect protection *]
[Protects your lawn from top to bottom]
[Protects lawns from [grub] [soil insect] damage]
[Kills both surface and soil insects]
Controls older grubs [for wider application window]
Controls grubs later in the season]
[Dual action formula for season long control]
[Dual action formula [Kills Surface Insects] Kills Soil Insects]
[Treats up to 5,000 sq. ft.]
[Treats up to 3,775 square feet for Mole Crickets]

[Bracketed Text] = Optional language

[One application kills grubs [including] [larvae of] [Asiatic Garden Beetle], [Black Turfgrass Ataenius], [Chafers], [Japanese Beetle], [May or June Beetle], [and] [Oriental Beetle] all season long.]
[Apply anytime spring through late summer.]
[Apply anytime from May through mid-August]
[One application kills [White] [Grubs] [and] [European Crane Fly Larvae] all season long.]
[Kills [White] [Grubs] [and] [European Crane Fly Larvae] before they damage lawns.]
[Easy-to-Use Granules]
[Kills Grubs Now, Prevents Them All Season Long!]
[Not for sale, sale into, distribution and/or use in Nassau, Suffolk, Kings and Queens counties, New York.]
[Grub life cycle and graphics] (see last page for graphics)