

8/9/2012

1/9



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG 09 2012

Ann Turnbough, Ph.D.
Control Solution Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507

Subject: Addition of Optional Marketing Claims and Revised Language

Dear Dr. Turnbough:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 19, 2012:

EPA Registration 53883-230

IMI-Lambda G Insect Granules

Registration Division (RD) has conducted a review of this request of applicability under PRN 98-10 and finds that the label changes(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Dani Daniel". The signature is written in a cursive, flowing style.

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch



United States
Environmental Protection Agency
 Washington, DC 20460

AUG 09 2012

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883-230	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI-LAMBDA G INSECT GRANULES	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification: Add optional marketing claims and revise language (minor grammatical errors)

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> Attached to container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Anne Turnbough	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 281-892-2532
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>		3. Date Application Received (Stamped)
2. Signature <i>Anne M. Turnbough</i>	3. Title Director, Regulatory Affairs	
4. Typed Name Anne Turnbough	5. Date July 19, 2012	

3/9



CONTROL SOLUTIONS
incorporated

July 19, 2012

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Re: EPA Reg. No. 53883-230

Dear Sir or Madam:

CSI is requesting a notification to add optional marketing claims and revise language (minor grammatical errors) to EPA registration number #53883-230.

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

The following documents are enclosed in support of this application

- 8570-1
- 1 copy of label- highlighted and un-highlighted

Please contact me directly should you need any additional information.

Sincerely,

Anne Turnbough, Ph.D.
Director, Regulatory Affairs

OPTIONAL PRODUCT FACT BOX

AUG 09 2012

IMI-Lambda G INSECT GRANULES

For outdoor use around the home only.

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)

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.

4/9

Spreader Settings for Overall Lawn Application

Spreader Make and Model	Spreader Settings for Overall Lawn Application		
	0.8 lb/ 1000 sq ft	1.2 lb/ 1000 sq ft	2 lb/ 1000 sq ft
CYCLONE Rotary	XX	XX	XX
IK-GRO Rotary	XX	XX	XX
Drop	XX	XX	XX
REPUBLIC	XX	XX	XX
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	XX	XX	XX
Rotary	XX	XX	XX
Drop	XX	XX	XX
EARTHWAY	XX	XX	XX
Rotary	XX	XX	XX
PRECISION	XX	XX	XX
Rotary (#S850)	XX	XX	XX
RED DEVIL	XX	XX	XX
Rotary	XX	XX	XX
TRUE TEMPER	XX	XX	XX
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
Treat Ants (except Carpenter and Pharaoh Ants) and other insects when they first appear or you notice lawn damage					Billbugs Dung beetle grubs Hyperodes weevils			Grubs				

DIRECTIONS FOR APPLYING IMI-LAMBDA G

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 listed pests may enter the home. 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 [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 control of Fire Ants apply at the rate of 2 lb per 1000 sq ft (an area 20' x 50')
Spot Treatment	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. For <i>billbug control</i> , apply when activity is first observed or when chewed or brown grass indicates damage from these insects. For <i>grub control</i> , except dung beetle, treat any time between late July and early October. For <i>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.
	Ants*	Water lightly immediately after application	Apply 0.5 teaspoons over and around each anthill.

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

6/9

OPTIONAL DIRECTIONS FOR BAND TREATMENT

OPTION A

BAND TREATMENT AROUND HOUSE

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 liked 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-xxx
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 • Lasts for up to 3 months [12 weeks] against Red Imported Fire Ants • Keeps on Killing Red Imported Fire Ants for up to 3 months [12 weeks] • Protects your yard from Red Imported Fire Ants for up to 3 months [12 weeks] • Kills fire ants and prevents new mound formation for up to 3 months [12 weeks] • Kills [Works on][Effective control of [against]] all types of listed lawn invading [lawn damaging] insects [pests] • Fast acting plus killing power [control] against Red Imported Fire Ants • Control against Red Imported Fire Ants • Starts to work immediately [in minutes], keeps working [lasts] against Red Imported Fire Ants • Limits new mound formation [mound movement] • [One application] lasts 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 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]
[1 Application Provides Control]
[Apply anytime between Spring throughout Summer]
[Kills Grubs]
[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 Soil & Surface Insect Control]
[Two [2] Active Ingredients for Grub Control]
[3 Month] soil insect [protection] [control]
[3 Month] soil and surface insect [protection] [control]
[3 Month] 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 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]
[One application kills grubs [including] [larvae of] [Asiatic Garden Beetle], [Black Turfgrass Ataenius], [Chafers], [Japanese Beetle], [May or June Beetle], [and] [Oriental Beetle]]
[Apply anytime spring through late summer.]
[Apply anytime from May through mid-August]

[One application kills [White] [Grubs] [and] [European Crane Fly Larvae]

[Kills [White] [Grubs] [and] [European Crane Fly Larvae] before they damage lawns.]

[Easy-to-Use Granules]

[Kills Grubs Now, Prevents Them]

[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)

[Treats up to 7,500 sq. ft.]

[Kills Ants*, Fleas, Ticks, Grubs, Mole Crickets, Chinch Bugs and other listed insects][*Except Carpenter and Pharaoh]