UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 15 1992

Ms. Rebecca M. Horton Regulatory & Graphics Coordinator Dragon Corporation P.O. Box 7311 Roanoke, VA 24019 655 419,537

Dear Ms. Korton:

Subject: Labelling Submitted 2/23/90 in Compliance with the Bacillus thuringiensis Registration Standard

Dragon Dipel Dasc

EPA Registration No. 16-111

The labelling to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable subject to the following comments.

- 1. Replace "Bacillus thuringiensis subspecies kurstaki Lepidopteran active toxin 0.056%" with "Bacillus thuringiensis subspecies kurstaki Potency of 240 International Units per mg of Product (0.1089 Billion IU/Pound of Product).... 0.048%" When your supplier of Bacillus thuringiensis modifies their label to list the percent lepidopteran toxin, you must modify your label to list the toxin percentage and submit a label amendment within 60 days.
- 2. Add the statement "Potency units should not be used to adjust use rates beyond those specified in the Directions for Use section." directly below the ingredient statement.
- 3. Modify the environmental hazards statements to read "Do not contaminate water when disposing of equipment washwaters." in compliance with the 6/17/91 amendment to the <u>Bacillus thuringiensis</u> Registration Standard.
- 4. Delete the terms "natural" and "organic" as they are implied safety claims.
 - 5. Delete the phrase "General Classification."
- 6. The application rates in the directions for use seem to indicate that this is a home garden use product. However, the aerial application instructions do not agree with this determination. You must therefore either comply with PR Notice

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EPA Form 1320-1A (1/90)

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aerial application directions and clarify that this product is for home garden use.

A stamped copy of the label is enclosed for your files. Submit five (5) final printed labels. Release of the revised labeling approved in this letter into commerce constitutes your acceptance of the conditions outlined in this letter.

Sincerely,

hil Hutton

Product Manager 18

Insecticide-Rodenticide Branch Registration Division (H7505C)

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DIPE **DUST**

A BIOLOGICAL INSECTICIDE

CONTROLS: Cabbage Looper, Imported Cabbage Worm, and Hornworm on certain listed vegetables.



Cabbage Looper

Hornworm

Cabbage Worm

99 944". 100 000".

Grape Leaf Folder

ACTIVE INGREDIENT:

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Potency - 240 International Units perimg (1089 Billion International Units per pound of product)

Dipeth is a registered trademark of Abbott Laboratories, North Chicago, IL

Keep Out of Reach of Children CAUTION

See back panel for additional precautionary statements. **NET WEIGHT 1 LB.**

COMMENTS

DIPEL® DUST

(Bacillus thuringiensis)

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH LABEL CAUTIONS, WARNINGS AND DIRECTIONS; AND IN CONFORMITY WITH FEDERAL AND STATE REGULATIONS.

Dipel Dust is a biological insecticide intended for use against chewing larvae (caterpillars) of certain lepidopterous species.

PRECAUTIONARY STATEMENTS ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning or disposal of wastes. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters

DIRECTIONS FOR USE

General Classification

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

STORAGE & DISPOSAL

Storage: Store only in original container, in a cool, dry place inaccessible to children and pets and away from feed and foodstuffs.

Pesticide Disposal: Securely wrap original container in several layers of newspaper and discard in trash.

Container Disposal: Do not reuse empty container. Discard container in trash.

Dipel Dust is recommended for use by ground or by air. Apply when pests are first noticed and repeat as necessary. Thorough plant coverage is necessary for control.

APPLICATION RATE

For the control of Cabbage Looper on Broccoli, Cabbage, Cauliflower, Kale, Mustard and Turnip Greens, Celery, Lettuce, Melons, Potatoes, Spinach, Tomatoes and Cucumbers (southeastern U.S. only), apply approximately 1/2 to 1 lb./500 sq. ft.

For the control of Imported Cabbage Worm on Broccoli, Cabbage, Cauliflower, Collards, Kale, Mustard and Turnip Greens, apply approximately 1/2 to 3/4 lb./1,000 sq. ft.

For the control of **Grape Leaf Folder** on Grapes, apply approximately 1/2 to 1 lb./500 sq. ft.

For the control of **Hornworm** on To-bacco, apply approximately 1/2 to 1 tb./1,000 sq. ft.

NOTICE

Buyer assumes all risks of use, storage or handling of this material not in strict accordance with DIRECTIONS and CAUTIONS stated on this label.

Distributed by
DRAGON CORPORATION
Roanoke, VA 24019-0311

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EPA Reg. No. 16-111