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

Dear Ms. Horton:

Subject: Labelling Submitted 2/23/90 in Compliance with the
Bacillus thuringiensis Registration Standard
Dragon Dipel Wetttable
EPA Registration No. 16-112

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 0.9%" with "Bacillus thuringiensis subspecies kurstaki Potency of 4320 International Units per mg of Product (1.96 Billion IU/Pound of Product).... 0.86%" 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 Bacillus thuringiensis Registration Standard.

4. Delete the terms "natural" and "organic" as they are implied safety claims.

5. Delete the phrase "General Classification."

6. Delete the phrase "unlike chemical insecticides" as it is an implied safety claim.

CONCURRENCES

SYMBOL	<i>[Signature]</i>						
SURNAME	H 7505C						
DATE	6/15/92						

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

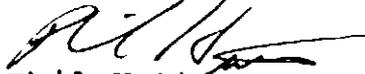
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7. Delete the statements "Pets and family can return to the yard or garden immediately after spraying. Vegetables may be picked and consumed anytime after spraying." If you wish to provide reentry statements on your label, they should be consistent with PR Notice 83-2 and discourage reentry or consumption of treated crops prior to the sprays having dried. Another label amendment will be necessary to add these instructions.

8. Delete the statements "The active ingredient, *Bacillus Thuringiensis*, has been commercially proven to selectively affect only leaf-eating caterpillars; nothing else. Lady beetles, earthworms, honey bees and other beneficial insects are not harmed, so spray coverage can be complete, without worry." We will accept claims for *Bacillus thuringiensis* not affecting a specific life stage of a specific insect if you reference or submit appropriate nontarget insect studies.

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,



Phil Hutton
 Product Manager 18
 Insecticide-Rodenticide Branch
 Registration Division (H7505C)

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DRAGON^(P)

DIPEL[®]

WETTABLE



BIOLOGICAL INSECTICIDE FOR HOME VEGETABLE GARDENS AND ORNAMENTALS

ACTIVE INGREDIENT
Bacillus thuringiensis
Lepidoptera

INERT INGREDIENTS

Potency: 0.001%
Interpretation: 0.001%
DPR: 7

TOTAL

Keep Out of Reach of Children
CAUTION

NET WEIGHT 4 OZ

ENVIRONMENTAL HAZARDS

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 a 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.

DRAGON DiPel[®] Wettable, unlike chemical insecticides, can be used anytime caterpillars (leaf-eating worms) appear in trees or vegetables. Pets and family can return to the yard or garden immediately after spraying. Vegetables may be picked and consumed anytime after spraying. The active ingredient, Bacillus Thuringiensis, has been commercially proven to selectively affect only leaf-eating caterpillars, nothing else. Lady beetles, earthworms, honey bees and other beneficial insects are not harmed, so spray coverage can be complete, without worry.

DRAGON DiPel[®] Wettable is easy to mix and apply with regular sprayers. Place half the required amount of water in tank or jar, add recommended amount of DRAGON DiPel[®] Wettable, shake or stir, add balance of water and mix. Do not store diluted spray more than 12 hours.

Since DRAGON DiPel[®] Wettable works only in a caterpillar's stomach, a small amount of treated leaf must be eaten to provide a lethal dose. Complete spray coverage of both sides of foliage is necessary. After biting treated portion of leaf, caterpillars stop feeding within a few hours. Death follows in a few days.

Apply when caterpillars (or their damage) first appear. Retreatment at 7 to 10 day intervals may be required, especially as egg hatch may occur over an extended period of time. Use of higher number of recommended tablespoons per gallon of spray provides a longer period of control.

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

EPA Reg. No. 16-112

EPA Est. 16-VA-1

RECOMMENDED USES

- Ornamental & Shrub (up to 25 feet)
- Gypsy Moth larva
- Spring & Fall Caterpillars
- Fall Webworm
- Tent Caterpillar (California only)
- Elm Spanworm
- Flowers (Mums)
- VEGETABLES**
- Cabbage Looper
- Lettuce, Broccoli, Kale, Spinach, M
- Cabbage Looper
- Imported Cabbage Diamondback M
- Beans, Cucumbe
- Cabbage Looper
- Tomatoes
- Tomato Hornworm
- Tomato Fruitworm
- Cabbage Looper
- Celery
- Cabbage Looper
- Grapes
- Grape Leaf Folder
- ** For best control of caterpillars necessary.
- ** DRAGON DiPel[®] Wettable is effective up to the d
- ... For best re

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BEST AVAILABLE COPY

ACCEPTED with COMMENTS in EPA Letter Date

JUN 15 1992

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the product registered under EPA Reg. No. 16-112