

10951-17

5-7-2003

1/7

United States Environmental Protection Agency

MAY 07 2003

Masuo Robinson
 Authorized Agent for Britz Fertilizers, Inc.
 Robinson Associates Consultants
 102 Greenfield Place
 Los Gatos, CA 95032

Dear Mr. Robinson:

Subject: Britz BT Dust
 EPA Reg. No. 10951-17
 Applications for amendment dated February 28, 2003

On February 28, 2003, Britz Fertilizers, Inc. submitted an application to amend the label and Confidential Statement of Formula (CSF) of the subject product. Revisions are made to:

- 1) Add First Aid statements in accordance with PR Notice 2001-1;
- 2) Revise the Active Ingredient statement to correct the percent active ingredient;
- 3) Revise the potency disclaimer statement in the Active Ingredient Statement in accordance with the Bt RED;
- 4) Add a dust mask statement in accordance with the Bt RED;
- 5) Revise the Precautionary statements to include updated language;
- 6) Add a spray drift statement in accordance with the Bt RED;
- 7) Update the Personal Protective Equipment and User Safety Recommendations;
- 8) Replace the Confidential Statement of Formula (basic formulation) with an updated version (dated 2/28/03).

The amendment referred to above is acceptable under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. The CSF of record (dated 2/28/03) for Britz BT Dust (basic formulation) has been added to the product file. A stamped copy of the label is enclosed for your records.

CONCURRENCES

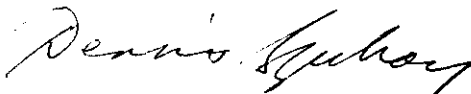
SYMBOL	7511						
SURNAME	Reed						
DATE	5/6						

OFFICIAL FILE COPY

-2-

Please submit two copies of the final printed label for Britz BT Dust to the Agency prior to release of the product for shipment. Also, be aware that this product is subject to Bt reregistration and additional label changes may be needed at that time. If you have any questions, please contact Alan Reynolds of my staff at (703) 605-0515 (e-mail: reynolds.alan@epa.gov).

Sincerely,



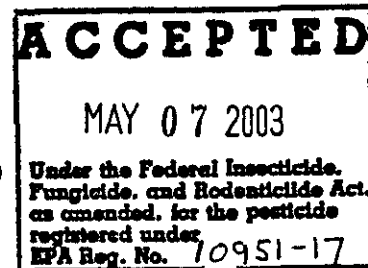
Dennis Szuhay, Acting Branch Chief
Microbial Pesticides Branch (7511C)
Biopesticides and Pollution Prevention Division

Enclosure

3/7

BRITZ BT DUST

(BACILLUS THURINGIENSIS, subsp. KURSTAKI, strain HD-1)

**ACTIVE INGREDIENT:**

Bacillus thuringiensis subsp. kurstaki solids, spores, and insecticidal toxins* 01.94%
 Inert Ingredients..... 98.06%
 TOTAL:..... 100.00%

*0.48 billion Cabbage Looper Units per pound product or 1066 CLU per gram product.

The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. • Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact day or night, 1-800-424-9300	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: long-sleeved shirt and long pants, chemical-resistant gloves made of any waterproof material, and shoes plus socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Mixers/loaders and applicators must wear a dust/mist filtering respirator meeting NIOSH standards of at least N-95, R-95, or P-95. Repeated exposure to high concentrations of microbial proteins can cause allergic sensitization.

4/7

ENGINEERING CONTROLS STATEMENTS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the worker protection standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS. **IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

USER SAFETY RECOMMENDATIONS

Users should:

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment wash waters.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the worker protection standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the worker protection standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the worker protection standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls, chemical-resistant gloves made of any waterproof material, and shoes plus socks.

8/7

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

Apply recommended amounts when air is calm, using ground equipment, aircraft, or hand duster. Apply at first sign of infestation and repeat at weekly intervals when needed to maintain control. Good underleaf coverage is essential since the insect must ingest Britz BT Dust. After eating Britz BT Dust, some insects stop feeding, but may otherwise appear to be unaffected for several days. Use the higher recommendations against very heavy infestations, or where it is difficult to obtain good coverage due to rank foliage. Britz BT Dust is exempt from tolerance requirements, and may be applied at recommended amounts up to the day of harvest.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower/treatment coordinator are responsible for considering all of these factors when making decisions.

**DO NOT MIX OR DILUTE WITH OTHER PRODUCTS.
THOROUGH COVERAGE ESSENTIAL WHEN USING BT DUST**

RECOMMENDATIONS

CROP	PEST	LBS. PER ACRE
Broccoli	Cabbage looper	20-30
	Imported cabbageworm	20-30
Cabbage	Cabbage looper	20-30
	Imported cabbageworm	20-30
Cauliflower	Cabbage looper	20-30
	Imported cabbageworm	20-30
Celery	Cabbage looper	20-30
Collards	Cabbage looper	20-30
	Imported cabbageworm	20-30
Cotton	Tobacco budworm	25-60
	Cotton bollworm	
	Cabbage looper	
Grapes	Grape leaf folder	20-30

Start treating as soon as possible after hatching and before larvae are protected by leaf folds. Apply by ground equipment to obtain thorough coverage of leaf surfaces. For the control of omnivorous leaf roller and grape leaf folder with a scheduled program of 4 to 6 applications, apply 12.5 to 25 lbs. per acre for each application.

6/7

CROP	PEST	LBS. PER ACRE
Grapes (CA)	Omnivorous leaf roller	20-30
Kale	Cabbage looper	20-30
	Imported cabbageworm	20-30
Lettuce	Cabbage looper	20-30
Melons	Cabbage looper	20-30
Mustard greens	Cabbage looper	20-30
	Imported cabbageworm	20-30
Potatoes	Cabbage looper	20-30
Spinach	Cabbage looper	20-30
Tomatoes	Cabbage looper	20-30
	Tomato hornworm	20-30
Turnip greens	Imported cabbageworm	20-30

STORAGE AND DISPOSAL STATEMENTS

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

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry place and avoid excess heat. Do not contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call: Chemtrec (800) 424-9300.

To confine spill: if dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of waste. In the event of a major spill, fire or emergency, call Chemtrec @ 1-800-424-9300 day or night.

CONDITIONS OF SALE AND WARRANTY

7/7

CONDITIONS OF SALE:

1. Britz Fertilizers, Inc. warrants that this material conforms to the chemical description on the label and is reasonably fit for use as directed hereon.

Britz Fertilizers, Inc. neither makes, nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, expressed or implied, concerning this material.

2. Critical and unforeseeable factors beyond the control of Britz Fertilizers, Inc. prevent it from eliminating all risk in connection with the use of chemicals. Such risks include, but are not limited to, damage to plants, and crops to which the material is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated hereon and even though label directions are followed. Buyer and user acknowledge and assume all risks and liability (except those assumed by Britz Fertilizers, Inc. under 1 above) resulting from handling, storage, and use of this material.

**BRITZ FERTILIZERS, INC.
P.O. BOX 366
FIVE POINTS, CA 93624-0366**

EPA REG. NO. 10951-17

EPA EST. NO. 10951-CA-1

NET WT _____ LBS.