

JUN 30 1993

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301 / 443,531
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Ms. Kresti A. Lyddon
Regulatory Affairs Supervisor
Ringer Corporation
9959 Valley View Road
Eden Prairie, Minnesota 55344-3585

Dear Ms. Lyddon:

Subject: Ringer® Vegetable Insect Attack® Dust Name Brand Change
EPA Registration No. 36488-25

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

1. Delete "Berliner" and replace "var." with "subsp." in the ingredients statement.
2. Move the Keep Out of Reach of Children statement above the signal word, Caution, and provide type that conforms with the point size requirements of 40 CFR 156.10(h).
3. Delete the statement "This product appears to have no adverse effects on earthworms or on beneficial insects such as ladybugs and praying mantids." Such statements are only acceptable if data supporting them, for all life stages of the beneficial insects listed, are submitted and found to support such claims by the Agency.
4. Delete "...since there appear to be no harmful residues."
5. Modify the active ingredient percentage in the ingredients statement from "0.3%" to "0.05%." This change is necessary since your label claims a potency of 240 IU/mg product.
[(240/500,000) (100%) = 0.048%]

6. Since your product is primarily intended for household use, modify the storage statement by adding "inaccessible to children." and change the disposal statement "Discard according to local refuse regulations" to read "Securely wrap original container in several layers of newspaper and discard in trash."

SYMBOL					
SURNAME	M. Lyddon				
DATE	6/28/93				

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7. Add the statement "Potency units should not be used to adjust use rates beyond those specified in the directions for use section." at the beginning of the application rates section.

8. Your last stamped approved label had tobacco as a target crop. Per your conversation and agreement with Mike Mendelsohn of my staff, add tobacco and associated pests (tobacco budworm, loopers, hornworms) to your master label.

9. Submit a copy of your current Confidential Statement of Formula within 45 days of the date of this letter.

Note that this acceptance of your label does not relieve you of your obligation to comply with the Worker Protection Standard. If any of your products are covered by this standard, you are required to submit, and receive the Agency's approval by April 21 1994, a revised label reflecting the required label statements of 40 CFR 156, published in the FEDERAL REGISTER on August 21, 1992 (57FR 38102). Further guidance will be issued. According to 40 CFR 156, subpart K: "No product to which this subpart applies shall be distributed or sold without amended labeling by any registrant after April 21, 1994. Please call 1-800-777-2185 if you have any labeling questions regarding the Worker Protection Standard.

A stamped copy of the label is enclosed for your records.

Sincerely,



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

CONCURRENCES

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DRAFT LABEL
December 17, 1992
36488-25
Ringer® Vegetable Insect Attack®
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ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 30 1993
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
36488-25

Front Panel:

Logo

Ready to Use Squeeze Duster

An effective way to kill worms and caterpillars quickly.

<u>Active Ingredients:</u>	<u>Percent:</u>
Bacillus thuringiensis Berliner, var. kurstaki, primary powder fermentation product, potency of 240 International Units per milligram of product (equivalent to 0.11 billion International Units per pound of finished Vegetable Insect Attack® Dust).....	0.3%
INERT INGREDIENTS:.....	99.7%
TOTAL:.....	100.0%

CAUTION Keep out of reach of children. (See side panel for additional precautionary statements.)

Net Weight 12 oz.

Side Panel:

Ringer® Vegetable Insect Attack® Dust is an effective control for worms and caterpillars. Worms feeding on treated vegetable plants or fruits quickly become sick, stop feeding and die.

This product appears to have no adverse effects on earthworms or on beneficial insects such as ladybugs and praying mantids. Can be used up to day of harvest and during storage, since there appear to be no harmful residues.

PRECAUTIONARY STATEMENTS:

Hazards to humans and domestic animals:

CAUTION: Avoid inhalation and contact with open wounds.

Environmental Hazards: Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE:

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

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Ringer® Vegetable Insect Attack®
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Ringer® Vegetable Insect Attack® Dust, in its easy-to-use shaker canister, is specially formulated as a dust to provide best results when caterpillars and worms are newly hatched. Thorough leaf coverage is necessary for effective control. Apply Vegetable Insect Attack® Dust when pests are first noticed and repeat every 7 days or as necessary.

Application Rates: Apply to foliage at a rate of 2 to 3 ounces per 50 feet of row plantings. Repeat every 7 days or as necessary.

Use on these crops:

- Broccoli
- Cauliflower
- Turnips
- Celery
- Cabbage
- Chinese Cabbage
- Kohlrabi
- Tomatoes
- Escarole
- Carrots
- Melons
- Spinach
- Kale
- Turnip Greens
- Mustard
- Brussels Sprouts
- Sweet Potato
- Endive
- Peppers
- Lentils
- Cucumbers
- Squash
- Collard
- Lettuce
- Beets
- Beans
- Peas
- Sweet Corn
- Eggplant
- Potato

To control these insects:

- Armyworms
- Diamondback Moth
- Green Cloverworm
- Hornworm
- Imported Cabbageworm
- Loopers
- Melonworm
- Pickleworm
- Mimosa Webworm
- Salt Marsh Caterpillar
- Tomato Fruitworm
- Corn Earworm
- Bollworm
- Tobacco Budworm

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Ringer® Vegetable Insect
Attack®
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Use on these fruits:

Blackberries
Dewberries
Strawberries
Blueberries
Grapes
Currants
Raspberries

To control these insects:

Armyworm
Grape Leafroller/Leafroller
Loopers
Grapeleaf Skeletonizer
Hornworm
Salt Marsh Caterpillar

STORAGE AND DISPOSAL:

Storage: Reclose container of unused product and store in a cool, dry place.

Disposal: Do not reuse empty package. Do not contaminate food or potable water by disposal. Discard according to local refuse regulations.

Ringer Corp. will not accept liability for damage or injury resulting from misuse.

Manufactured in the USA for:
Ringer Corporation
9959 Valley View Road
Eden Prairie, MN 55344

EPA Reg. No. 36488-25
EPA Est. No. 995-MN-001

UPC Code