

OCT 11 1995

Ms. Kari E. Pearson  
Troy Biosciences, Inc.  
1338 G Street S.E.  
Washington, D.C. 20003

Dear Ms. Pearson:

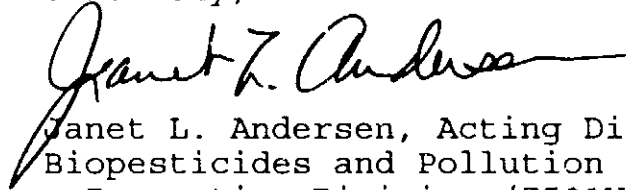
Subject: Fermone BT  
EPA Reg. No. 53871-6  
Label Amendment  
Your letters of May 24, 1994,  
July 21, 1995, and September 12, 1995

The application by Troy Biosciences for a Label Amendment for the subject product under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the change noted below. A stamped copy of the label is enclosed for your records.

Accepted nomenclature usage with respect to the subspecies of *Bacillus thuringiensis* which is the active ingredient of your product has changed from berliner to kurstaki. Accordingly you should change the designation on your label of the active ingredient to "*Bacillus thuringiensis kurstaki*".

Enclosure

Sincerely,

  
Janet L. Andersen, Acting Director  
Biopesticides and Pollution  
Prevention Division (7501W)

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS  
(# DOMESTIC ANIMALS)

Avoid inhalation or contact with eyes, skin, or open wounds. Do not inhale spray mist. In case of contact, immediately flush eyes or skin with plenty of water.

PERSONAL PROTECTIVE  
EQUIPMENT:

- Applicators and other handlers must wear:
  - A. Long-sleeved shirt and long pants.
  - B. Chemical resistant gloves, such as neoprene rubber or PVC or Viton or nitrile rubber or butyl rubber or barrier laminate.
  - C. Shoes plus socks must be worn.

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.

USER SAFETY RECOMMENDATIONS:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in a NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

Forestry Use: Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Aerial application over such sites is permissible only when they are not visible from above the tree canopy. Do not contaminate water when disposing of equipment washwaters.

Direct Water Application: Do not apply directly to treated, finished drinking water reservoirs or drinking water receptacles.

TROY-BT®  
FLOWABLE CONCENTRATE

BIOLOGICAL INSECTICIDE

Active Ingredients

Bacillus thuringiensis, Berliner Strain.....26.4%

Potency:

At least 200 million viable spores per mg.  
(equivalent to 125 billion IU per qt.)

Inert ingredients.....73.6%  
100.0%

CAUTION  
KEEP OUT OF REACH OF  
CHILDREN

EPA REGISTRATION NO. 53871-6  
EPA ESTABLISHMENT NO. 53871-AZ-1

NET CONTENTS: 1 QUART

LOT#  
USE BEFORE:

MFG. BY:  
TROY BIOSCIENCES, INC  
2620 N. 37TH DRIVE  
PHOENIX, AZ 85009  
(602)-233-9047

TROY-BT is a registered trademark  
of Troy Biosciences, Inc.

Troy Biosciences, Inc. warrants that this product (1) conforms to the ingredient statement on the label and (2) is reasonably fit for the purposes set forth in the Directions for Use.

Except as so warranted, the product is sold as is. Troy Biosciences, Inc. makes no warranty express or implied.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
OCT 11 1985

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
53871-6

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. Troy-Bt is a biological insecticide for the control of certain lepidopterous larvae (caterpillars or worms). Treated larvae usually stop eating within hours of ingestion and die within 1-5 days. Best control is obtained when larvae are small and actively feeding. Thorough and uniform spray coverage will improve control. For aerial applications, apply in 2-10 gallons of water per acre. Repeat applications every 3-10 days, depending on the insect population and severity of infestation. Use the higher label rates and shorter spray intervals under heavy pest population pressure. Troy-Bt may be used with approved spreader-stickers or in combination with certain chemical insecticides at reduced rates. The use of a feeding stimulant such as Konsul<sup>®</sup> may also increase the effectiveness of the product. Consult State Agricultural Extension or Experiment Station Specialists for specific local recommendations for mixtures with other pesticides. Do not use mixtures unless officially recommended and endorsed by State Agricultural Specialists or Extension Specialists. Troy-Bt is exempt from tolerance requirements and may be applied up to the day of harvest. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters.

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 12 hours. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical resistant gloves, such as neoprene rubber or PVC or Viton or nitrile rubber or butyl rubber or barrier laminate
- Shoes plus socks

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**DIRECTIONS FOR USE (CONTINUED)**

CROPS	INSECTS	RATE		
		fl. oz. per acre	fl. oz. per 100 gals	
<b>VEGETABLES,</b> including leafy, root, stalk, seed, and pod type, such as: beans, beets, broccoli, brussels sprouts, cabbage, carrots, cauliflower, celery, chard, chinese cabbage, cole crops, cucurbits, endives, escarole, eggplant, kale, kohlrabi, lentils, lettuce, mint, mustard greens, onions, parsley, peas, peppers, tomatoes, turnips, turnip greens, melons, watermelons.	armyworm,	2- 8		
	bollworm, corn earworm, diamondback moth, green cloverworm, hornworm, imported cabbageworm, looper, melonworm, rindworm, pickleworm, saltmarsh caterpillar, tobacco budworm, tomato fruitworm, variegated cutworm, webworm.	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		
	<b>SMALL FRUITS,                      GRAPES,                      BERRIES,                      STRAWBERRIES,                      POME &amp; STONE                      FRUIT,                      NUTTREES,                      CITRUS,                      TROPICAL FRUITS.</b>	gypsy moth,	2-8	
		cankerworm, fall webworm, fruitworm, hornworm, leaf folder, leafroller, looper, orangedog, reghumped caterpillar, saltmarsh caterpillar, skeletonizer, tent caterpillar, tufted apple budmoth, walnut caterpillar.	2 2 2 2 2 2 2 2 2 2 2 2 2	

CROPS	INSECTS
<b>ROW CROPS</b> such as: cotton, peanuts, soybeans, safflower, sunflower, sugarbeets, tobacco.	armyworm, cotton bollworm, green cloverworm, hornworm, looper, saltmarsh caterpillar, tobacco budworm, velvetbean caterpillar.
<b>SMALL GRAINS,                      FORAGE CROPS,                      ALFALFA, HAY,                      PASTURE,                      RANGELAND,                      TURF.</b>	sod webworm, alfalfa caterpillar, looper, rangeland caterpillar, skipper.
<b>ORNAMENTALS,                      GREENHOUSE                      PLANTS,                      SHADE TREES,                      FOREST.</b>	armyworm, gypsy moth, spruce budworm bagworm, budworm, cankerworm, diamondback moth, hornworm, leafroller, looper, oakworm, oleanderworm, spanworm, redhumped caterpillar, saddleback caterpillar, tent caterpillar, tussock moth.
<b>STORED                      PRODUCTS</b> grains, legumes, peanuts, oilseeds, other seeds.	indian meal moth, almond moth, mediterranean flour beetle.
Apply at a rate of 1 gallon of spray per 15 bushels or 1 gallon of spray per 50 sq. ft. if treating 4-8 inch	