



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

15 NOV 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Mr. David L. Olson
Director, Regulatory Affairs
Ecogen, Inc.
2005 Cabot Boulevard West
Langhorne, PA 19047-1810

Dear Mr. Olson:

Subject: Label Amendment for Outlast IP Changing the Signal
Word From Danger to Warning
EPA Registration Number 55638-8

The amendment referred to above, submitted in connection with registration under Section 24(c)(7)(D) of the Federal Insecticide, Fungicide, and Rodenticide Act, is amended (EPA), is acceptable provided that you do the following.

1. Since your product has the signal word warning and since your product does not have child resistant packaging, you also add the statement "Not for Use or Storage In or Around the Home."

2. Change the Statement of Practical Treatment to read as follows.

If Swallowed: Call a Physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove to fresh air. Get medical attention.

If on Skin: Wash with soap and water.

If In Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

3. Change the Warnings to "Humans and Domestic Animals" section to read as follows.

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Hazards to Humans and Domestic Animals
WARNING

May be fatal if swallowed or inhaled. Do not breathe dust or spray mist. Causes eye irritation. Do not get in eyes, on skin, or on clothing. Applicators, mixers, and loaders must wear goggles and a pesticide respirator approved by the Mining Enforcement and Safety Administration (formerly MSHA, Bureau of Mines) and by the National Institute of Occupational Safety and Health under the provisions of 29 CFR 1910.134.

4. On the container: "The area being treated must be vacated by unpoisoned persons." After the statement "do not apply this product in such a manner as to directly or through drift expose workers or other persons."

5. Supply the following information on the label: 40-2.

6. Do not use in areas where food, feed, or feed by products are produced, stored, or used. Do not store in plastic.

If the conditions of this agreement are not complied with the registration will be subject to cancellation in accordance with Section 5(c) of the Act.

Submit five (5) final printed labels within 30 days. If finished labeling cannot be furnished within the 30 day period, an extension should be requested.

Sincerely,



Phil Hutton
Product Manager 17
The Clial Company
Registration Division (775) 2

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PM 17

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CUTLASS^R
Wettable Powder Bioinsecticide

Active Ingredient:
Bacillus thuringiensis subspecies
kurstaki strain EG2371
Lepidopteran active toxin. 10.0%

Inert Ingredients. 90.0%
Total. 100.0%
1.6 oz active ingredient per pound.

Cutlass^R is a biological insecticide for the control of lepidopteran pests.

KEEP OUT OF REACH OF CHILDREN
WARNING

STATEMENT OF PRACTICAL TREATMENT

In case of contact, immediately flush eyes and skin with plenty of water. Get medical attention if irritation persists.

AVISO
PRECAUCION AL USARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta haya sido explicado ampliamente.

EPA Reg. No. 55638-8
EPA Est. No. 769-GA-1

Ecogen Inc.
2005 Cabot Blvd West
Langhorne, PA 19047-1810

Net Contents 4 U.S. Pounds

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 5 1989

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

55638-8

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS and Domestic Animals

Causes eye and skin irritation. Do not get in eyes, on skin, or on clothing. Harmful if swallowed or inhaled. Avoid breathing dust or spray mist.

Applicators, mixers, and loaders must wear a particle mask and goggles. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters.

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Storage and Disposal

Storage: Do not contaminate water, food, or feed by storage or disposal. Store in a cool, dry place inaccessible to children.

Pesticide Disposal: Do not contaminate water when disposing of equipment washwaters. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal:

Bag: 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!

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 such a manner as to directly or through drift expose workers or other persons.

Do not enter treated areas without protective clothing until sprays have dried.

Preharvest Interval: There are no restrictions for applying Cutlass^R bioinsecticide up to the time of harvest.

Cutlass^R is a selective insecticide for use against the lepidopteran larvae listed below. Larvae must consume deposits of Cutlass^R to be affected. Always follow these directions:

- o Treat when larvae are young (early instars) and are actively feeding on exposed plant parts.
- o Apply before foliar damage has occurred.

- o Thorough spray coverage is essential for good insect control. Directed drop nozzles may be required for some crops.
- o When insect infestations are heavy, use the higher label rates, shorten the spray interval, and/or use larger total spray volume to improve spray coverage.
- o Repeat applications at an interval sufficient to maintain control, usually 3-14 days depending on plant growth, insect activity, and weather conditions after spraying.
- o For improved durability of spray deposits, an approved spreader/sticker is strongly recommended for hard-to-wet crops, such as cole crops.
- o After consuming a lethal dose of Cutlass^R, larvae will cease feeding, but may remain on the foliage until they die within several days. Dying larvae move slowly, discolor, shrivel and blacken prior to death.
- o Local conditions may affect the use of Cutlass^R. Consult State Agricultural Extension Specialists for specific recommendations related to local crop protection problems.

Application Instructions

Cutlass^R bioinsecticide may be applied with conventional ground or aerial equipment with quantities of water sufficient to provide thorough coverage of infested plants. To obtain a suitable mixture with water, add enough water to allow maximum agitation. With agitator running, slowly add in the Cutlass^R. Continue agitation. Then add remainder of water and other spray materials and agitate until mixed. Maintain suspension while loading and spraying. Do not mix more Cutlass^R than can be used in a 12-hour period. Rinse and flush spray equipment thoroughly following each use. Do not contaminate water when disposing of equipment washwaters.

Crop	Pest
Asparagus Beans Beets Bok Choy Broccoli Brussel sprouts Cabbage Cauliflower Celery Chicory Collards Cucumber Escarole Endive Horseradish Kale Lettuce (Head, Leaf, Romaine) Mustard Greens Parsnips Peas Peppers Radishes Spinach Sugar Beets Swiss chard Tomatoes Turnips Strawberries Watercress	Armyworms Beet armyworm Cabbage looper Cabbage webworm Cross striped cabbageworm Diamondback moth Fall armyworm Imported cabbageworm
Cotton	Armyworms, Cabbage looper
Alfalfa, Hay & Seed	Alfalfa Caterpillar, Armyworms, Loopers
Tobacco	Tobacco budworm, Tobacco hornworm
Rate to Apply ¹	1.0 to 2.0 lbs/acre

¹ For ground applications, use up to 100 gallons of water per acre. For aerial applications, use up to 10 gallons of water per acre.

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Warranty and Conditions of Sale

Ecogen warrants that this product conforms to the description of this label and is reasonably fit for the purposes stated on this label when used in accordance with the directions on this label under normal conditions for use. ECOGEN MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

If this product is defective, Buyer's exclusive remedy shall be the replacement of the product, or if replacement is impracticable, refund of the purchase price. In no case will Ecogen be liable for incidental, consequential or special damages resulting from the handling, storage or use of this product.

Cutlass^R is a trademark of Ecogen Inc.
Patent Pending
Vers. 7/89 c 1989 Ecogen Inc.

PM17
55638-8
11-18

15 NOV 1989

Dear Mr. [Name]:

Word From Danger to Warning
EPA Registration Number 55638-8

The amendment referred to above, submitted in connection with registration under Section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA), is acceptable provided that you do the following.

1. Since your product has the signal word Warning and since your product does not have child resistant packaging, you must add the statement "Not for Use or Storage In or Around the Home."

2. Change the Statement of Practical Treatment to read as follows.

If Swallowed: Call a Physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove to fresh air. Get medical attention.

If on Skin: Wash with soap and water.

If In Eyes: Flush eyes with plenty of water. Get medical attention if irritation persists.

3. Change the Hazards to Humans and Domestic Animals section to read as follows.

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SP... of... goggles and a suitable respirator approved by the... and Safety Administration (formerly the U.S. Bureau of Mines) and Health under the provisions of 29 CFR Part 19.

4. Add the statement "The area being treated must be vacated by unprotected persons." after the statement "Do not apply this product in such a manner as to directly or through drift expose workers or other persons."

5. Comply with section II.A.6 and II.A.7 of PR Notice 83-2.

6. Move the statement "Do not contaminate water, food, or feed by storage or disposal." so that it is directly above the storage block.

If the conditions of this amendment are not complied with the registration will be subject to cancellation in accordance with Section 6(e) of the Act.

Submit five (5) final printed labels within 30 days. If finished labeling cannot be furnished within the 30 day period, an extension should be requested.

Sincerely,

Phil Hutton /
Product Manager 17
Insecticide Rodenticide Branch
Registration Division (775-10)

BEST AVAILABLE COPY

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EPA Reg. No. 55638-8
EPA Est. No. 769-GA-1

Ecogen Inc.
2005 Cabot Blvd West
Langhorne, PA 19047-1810

Net Contents 4 U.S. Pounds

ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 1979

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this pesticide is registered under EPA Reg. No.

55638-8

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