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346	286,436	575	380,528
18			
300	345,057	28	
17			

NOV - 2 1990

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

Dear Mr. Olson:

Subject: Application to Amend the Subject Product's Formula
 Reflected in Your Confidential Statement of
 Formula Dated January 16, 1990
 Application to Amend Your Product's Label by Increasing
 the Maximum Application Rate
 EPA Registration No. 55638-8

The amendments referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable subject to the following comments:

1. Change the signal word to Danger.
2. Replace "Causes substantial, but temporary eye injury" with "Causes irreversible eye damage."
3. Replace "WARNING: Area treated . . ." with "Danger: Area treated"

58037:1:WPS:0:Mendelsohn:C:Disk:KENC0:10/28/90:ND:va:EK:DD
 CONCURRENCES

SYMBOL							
SURNAME							
DATE							

A stamped copy of the label and a copy of the eye irritation study review are enclosed for your records. Submit five (5) final printed labels before you release the product for shipment.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosures

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 Bioinsecticide is a biological insecticide for the control of lepidopteran pests.

KEEP OUT OF REACH OF CHILDREN
WARNING

STATEMENT OF PRACTICAL TREATMENT

- 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 with plenty of water. Call a physician.

AVISO

Precaution Al Usuario:

Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada 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

55638-8

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS and Domestic Animals

Harmful if inhaled. Avoid breathing dust or spray mist. Harmful if swallowed. Causes substantial, but temporary eye injury. Do not get in eyes, on skin or on clothing. Applicators, mixers and loaders must wear goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

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

Not for Use or Storage In or Around the Home.

RE-ENTRY STATEMENT

Do not apply this product in such a manner as to directly, or through drift, expose workers or other persons. The area being treated must be vacated by unprotected persons. Do not enter treated areas without protective clothing until sprays have dried.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an areas about to be treated with this product. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is a reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: WARNING: Area treated with CUTLASS^R on (date of application). Do not enter without protective clothing.

Storage and Disposal

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

Storage: 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.

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 in the Application Rate table. 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, shorter 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. Do not apply this product through any type of irrigation system. 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 Soybeans 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 3.0 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.

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. 7/90 c 1990 Ecogen Inc.