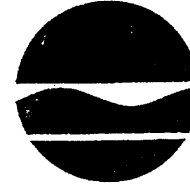


New York State Department of Environmental Conservation

Division of Solid & Hazardous Materials  
50 Wolf Road, Albany, New York 12233-7250  
Phone 518-457-6934 FAX 518-457-0629



Michael D. Zagata  
Commissioner

BT  
SD Kurstaki  
NOV - 5 1996  
EG 7841

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. David L. Olson  
Director, Regulatory Affairs  
Ecogen Inc.  
2005 Cabot Boulevard West  
P.O. Box 3023  
Langhorne, PA 19047-3023

Dear Mr. Olson:

Re: Registration of the New Active Ingredient - *Bacillus thuringiensis kurstaki* strain EG7841 Contained in the Pesticide Product Crymax Bioinsecticide (EPA Reg. No. 55638-34)

The New York State Department of Environmental Conservation (NYSDEC) has accepted your application for the registration of the new active ingredient, *Bacillus thuringiensis kurstaki* strain EG7841, contained in the pesticide product Crymax Bioinsecticide (EPA Reg. No. 55638-34). Crymax contains the Bt. kurstaki strain EG7841 which is a *Lepidopteran* active toxin, labeled to control *Lepidopteran* pest on various food and feed crops, ornamentals, trees and turf.

The data package for this product was reviewed by the NYSDEC Division of Fish, Wildlife, & Marine Research (DFW&MR), our Technical Support & Laboratory Services Section (TS&LS), and the New York State Department of Health (NYSDOH).

*Bacillus thuringiensis* was reviewed in the past for several other pesticide registration issues and the reviewers were able to complete their evaluation in a much shorter time frame than usual.

The DFW&MR Bureau of Environmental Protection (BEP) in a memorandum dated November 1, 1996 did not object to registration. The active ingredient is a genetically engineered microbe, with little or no adverse effects on non-target organisms. Therefore, use of Crymax Bioinsecticide as labeled, will not adversely impact the fish and wildlife resources of New York State.

The New York State Department of Health stated in their review, that the technical active was not toxic, pathogenic or infective in laboratory animals via oral, intratracheal or intravenous administration. The formulated product was not very toxic to laboratory animals via oral, dermal or inhalation exposure, was moderately irritating to animal eyes and non-irritating to animal skin. The United States Environmental Protection Agency (USEPA) determined that the current tolerance exemption for *Bacillus thuringiensis* is applicable to this *Bacillus thuringiensis*, subsp. *kurstaki* strain EG7841, *Lepidopteran* active toxin. A search of the available literature did not reveal any significant new

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Mr. David L. Olson

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information on the toxicity of *Bacillus thuringiensis* endotoxins. Use of this product is not likely to pose a significant risk to public health and we do not object to registration of Crymax Bioinsecticide in New York State.

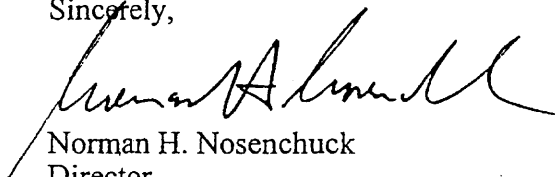
The TS&LS Section stated in their review that they did not object to the registration of Crymax Bioinsecticide (EPA Reg. No 55638-34) in New York State. The active ingredient is a genetically engineered microbe, with little or no adverse effects on non-target organisms. Since there should be no impact to surface or to groundwater, TS&LS has no objections to the registration of Crymax Bioinsecticide.

After consideration of the reviews by NYSDOH, DFW&MR, and by TS&LS, our Pesticide Product Registration Section recommends **registration** of the new active ingredient, *Bacillus thuringiensis* subspecies *kurstaki* EG7841 contained in the pesticide product Crymax Bioinsecticide (EPA Reg. No. 55638-34) for use on terrestrial vegetable & cole crops, terrestrial herbs & spices, pasture & hay crops, terrestrial field crops, terrestrial commercial flower & ornamental crops, forest, shade tree & nursery stock, and turf as labeled.

Therefore, enclosed for your records are the stamped-accepted label and the certificate of registration for the above product.

If you have any questions on this matter, please contact Maureen Serafini, Supervisor of our Pesticide Product Registration Section, at (518) 457-7446.

Sincerely,



Norman H. Nosenchuck  
Director  
Division of Solid & Hazardous Materials

Enclosures

cc: w/enc. - D. Rutz/W. Smith, Cornell University  
N. Rudgers, NYS Dept. of Ag. & Mkts.  
N. Kim/A. Grey, NYS Dept. of Health