

19713-296

7/22/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

JUL 22 2010

Luz G. Chan
Registration Manager
Drexel Chemical Company
1700 Channel Avenue
Memphis, TN 38113-0327

Subject: IDA's SULFA-92
EPA Reg. No. 19713-296
Your amendment dated January 28, 2010
EPA Decision Number 423401

Dear Ms. Chan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided that you revise the following:

- 1) On page 1, add the following paragraph after the "**PERSONAL PROTECTIVE EQUIPMENT (PPE)**" section, "Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistance category selection chart."
- 2) On page 1, "PPE" section, replace the phrase "waterproof gloves" to "chemical resistant gloves" and revise the sentence to read, "**Applicators and other handlers must wear:** Long-sleeved shirt and long pants, chemical resistant gloves made of waterproof material such as polyethylene or polyvinyl chloride, shoes plus socks and protective eyewear. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use..."
- 3) On page 2, revise the "**PHYSICAL HAZARDS**" heading to "**PHYSICAL AND CHEMICAL HAZARDS**" and revise the sentence in that section to read, "Sulfur dust suspended in air ignites easily. Keep away from heat, sparks or flame. Do not smoke while applying this product."
- 4) On page 2, in the "**MIXING INSTRUCTIONS**" section, 1st sentence, delete the word, "recommended" and replace it with the word "specific".

- 5) On page 2, in the "**AIR APPLICATION**" section, 4th sentence, delete the word, "recommended" and replace it with the word "specific".
- 6) On page 3, in the "**STORAGE AND DISPOSAL**" section, revise the third sentence to read, "Store in a cool, dry area away from any heat or ignition source."

One copy of the label stamped "Accepted with comments" is enclosed for your records. This label supercedes all labels previously accepted for this product. Please submit one copy of the final printed label that incorporates the required changes before the product is released for shipment.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7504P)

Enclosure

3/7

ACCEPTED
with COMMENTS
In EPA Letter Dated

JUL 23 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended. This pesticide
registered under EPA Reg. No.
19713-296



Sulfa 92

ACTIVE INGREDIENT:

Sulfur 92.0%

OTHER INGREDIENTS:

..... 8.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-296

EPA Est. No. 19713-XX-XXX

Net Content: _____

FIRST AID

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious or convulsing person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes eye and skin irritation. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, waterproof gloves, shoes plus socks and protective eyewear.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38113-0327

SINCE 1972



The Drexel logo is a registered trademark of Drexel Chemical Company.

USER SAFETY RECOMMENDATIONS

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. 3) 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 apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of rinsate or equipment wash waters.

PHYSICAL HAZARDS

Keep away from heat, sparks or flame. Do not smoke while applying this product.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations. 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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, 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 (REI). 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 of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is: Coveralls, waterproof gloves, shoes plus socks and protective eyewear.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the WPS for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Keep unprotected persons and domestic animals out of the treated area until sprays have dried.

MIXING INSTRUCTIONS: Pour recommended amount of this material into one-third filled spray tank. Add balance of water to fill tank. Keep agitator running during filling and spraying operations. Do not allow mixture to stand. Do not use in low volume gear-type spray equipment.

WATER VOLUME: Use designated amount of product in the following gallons of water per acre.

DILUTE APPLICATION—Ground Application: Apply specified rate in 20 to 60 gallons of water per acre. Orchard Application: Apply specified rate in 100 to 800 gallons of water per acre.

CONCENTRATE APPLICATION—Ground Application: Apply specified rate in not less than 5 gallons of water per acre. Orchard Application: Apply specified rate in 20 to 100 gallons of water per acre. Special concentrate equipment is necessary for these uses.

AIR APPLICATION—Apply specified rate in 3 to 20 gallons of water per acre. Orchard rates should not be applied in less than 10 gallons of water per acre.

Use higher rates when using dilute applications. Use lower recommended rate when using concentrate equipment.

CHEMIGATION: DO NOT APPLY this product through any type of irrigation system. Consult with State Agricultural Experiment Station or State Agricultural Extension Service personnel for additional information consistent with label precautions and directions.

COMPATIBILITY: SULFA 92 is compatible with most pesticides. Because conditions vary, a small amount of the pesticide should be mixed prior to application to examine compatibility. ALWAYS ADD THE PESTICIDE TO THE MIXED PRODUCT.

Notes:

Sulfur will cause severe fruit and leaf injury to sulfur sensitive crops. Do not allow this material to drift onto sulfur sensitive Apricots, Cucumbers, Melons, Squash and other plants which might be injured by sulfur.

When growing crops for processing, consult processor before applying sulfur.

Do not use within 2 weeks of an oil spray treatment; for Citrus within 21 days.

Do not apply when shade temperatures exceed or are likely to exceed 90°F. Sulfur may burn foliage and fruit during periods of high temperatures and under certain climatic conditions.

5/15

USE

Crop	Pest/Insect	Rate per Acre
Alfalfa	Lygus, Pacific mites, Strawberry mites	10 to 20 lbs.
	SPECIFIC DIRECTIONS: Repeat application at 1 to 2 week intervals.	
Almonds	Suppression of Brown almond mites, European red mites, Two-spotted mites, Pacific and Strawberry mites	3 to 5 lbs.
	SPECIFIC DIRECTIONS: Apply 5 weeks after petal fall. Do not apply within 14 days of an oil application.	
Apples	Powdery mildew, Scab	4 to 5 lbs.
	SPECIFIC DIRECTIONS: Apply from pink or pre-blossom spray through second cover spray. Add 1 gal. of lime sulfur in pink and calyx sprays. Use on sulfur tolerant varieties only. Golden delicious, Jonathan, MacIntosh and certain other varieties may be injured by sulfur under certain climatic conditions.	
Asparagus	Rust	15 to 35 lbs.
	SPECIFIC DIRECTIONS: Apply after cutting stops, irrigate, cultivate, then apply the sulfur. Repeat at 7 to 10 day intervals through the season. For Rust control during fern period, apply at 2 to 3 week intervals or with the regularly scheduled insect program.	
	Suppression of Brown mites, Two-spotted mites	6 to 8 lbs.
SPECIFIC DIRECTIONS: Apply when pest first appears and repeat as necessary.		
Beans, Peas	Powdery mildew, Spider mites	6 to 10 lbs.
	White mold	10 to 20 lbs.
	SPECIFIC DIRECTIONS: Sulfur may injure certain varieties of Beans. Begin application when pests first appear and repeat as necessary.	
Boysenberries, Raspberries, Strawberries	Powdery mildew	4 to 10 lbs.
	SPECIFIC DIRECTIONS: Begin at first sign of disease and repeat as necessary. Discontinue applications during hot weather. Sulfur may injure Strawberries under certain climatic conditions. Do not use on sulfur sensitive varieties.	
Carrots, Onions, Garlic	Petrobia white mildew, Powdery mildew	9 to 15 lbs.
	SPECIFIC DIRECTIONS: Apply when the disease(s) first appear and repeat as needed.	
Cherries	Blossom blight, Brown rot, Leaf spot, Powdery mildew	Dilute Spray: 4 to 6 lbs. Aerial or Concentrate Application: 15 to 20 lbs.
	SPECIFIC DIRECTIONS: Begin application in popcorn stage. Repeat at bloom, petal fall and in cover sprays at 7 to 14 day intervals and as a post-harvest foliar treatment for Leaf spot.	
Corn, Small grains (barley, oats, rye, wheat), Sorghum, Soybeans	For suppression of Grass banks mites, Pacific mites and Two-spotted mites	6 to 15 lbs.
	For control of Atlantic mites (small Grain only) and Powdery mildew	
SPECIFIC DIRECTIONS: Apply when disease(s) first appear and repeat as necessary or with the regularly scheduled insect program.		
Cotton	Spider mites, Strawberry (Atlantic) mites	2 to 10 lbs.
	Lygus	10 to 15 lbs.
	SPECIFIC DIRECTIONS: Begin when infestation first occurs and repeat at 1 to 2 week intervals as necessary or with regularly scheduled insecticide program.	
Citrus	For suppression of Citrus mites, Citrus flat mites, Six spotted mites, Yuma spider mites	4 to 30 lbs.
	SPECIFIC DIRECTIONS: Apply at bloom or early petal fall. Repeat as necessary.	
Grapes	Powdery mildew	3 to 5 lbs.
	SPECIFIC DIRECTIONS: Apply when shoots are 6 inches long. Repeat before blossoms open and continue as necessary. Concord and Labrusca type grapes may be injured by sulfur.	

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917

(Cont.)		
Crop	Pest/Insect	Rate per Acre
Melons	Powdery mildew	20 to 25 lbs.
	SPECIFIC DIRECTIONS: Powdery mildew may be controlled by sulfur, but the sulfur often injures the vines, particularly if the temperature reaches 95°F. Treat when the disease first appears. Repeat as necessary. DO NOT USE ON SULFUR SENSITIVE VARIETIES.	
Peaches, Nectarines	Brown rot, Coryneum blight, Peach silver mites, Powdery mildew, Rust	15 to 30 lbs.
	SPECIFIC DIRECTIONS: Begin in pink bud stage and repeat at bloom, petal fall and in cover sprays at 7 to 14 day intervals. Apply up to harvest on Peaches. Do not apply after jacket stage on Nectarines. For Brown rot (Peaches only) control in Summer sprays, apply 6 lbs. per 100 gallons of water, or 15 to 20 lbs. per acre. Begin application about 4 to 5 weeks before harvest and continue at weekly intervals.	
Peanuts	Rust	3 to 12 lbs.
	SPECIFIC DIRECTIONS: Start in early leaf stage. Repeat applications as necessary, usually 10 to 24 days.	
Pears	Powdery mildew, Scab	20 to 30 lbs.
	SPECIFIC DIRECTIONS: Apply in the pink or pre-blossom spray. On Bartlett pears, apply 4 to 6 lbs. at petal fall through second cover sprays. Sensitive varieties (D'anjou and Comice) under certain climatic conditions may be injured by sulfur.	
Plums, Prunes	Brown rot, Prune rust	20 to 25 lbs.
	SPECIFIC DIRECTIONS: Apply at bloom or early petal fall. Repeat as necessary.	
Potatoes	Powdery mildew, Two-spotted spider mites	6 to 10 lbs.
	SPECIFIC DIRECTIONS: Apply when disease first appears. Repeat applications at 3 to 4 week intervals or as necessary.	
Sugar beets	Powdery mildew	6 to 12 lbs.
	SPECIFIC DIRECTIONS: Begin at first sign of disease. Use lower rates for light disease pressure or as a preventative treatment. Repeat applications at 3 to 4 week intervals or as necessary.	
Tomatoes	Tomato russet mites	15 to 30 lbs.
	SPECIFIC DIRECTIONS: Begin when infestation first occurs and repeat as necessary or with the regularly scheduled pest program.	

ORNAMENTALS		
Roses	Black spot, Powdery mildew, Rust	3 tbsps. per gal. (6 lbs. per 100 gals.)
	SPECIFIC DIRECTIONS: Spray for full coverage wetting both sides of leaves. Begin applications when new growth appears in the Spring and repeat every 7 days if necessary.	

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow bags to become wet or to be stored in a damp, humid area. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original container only. If the contents are leaking or material is spilled, follow these steps.

1. Collect and place in suitable containers for disposal.
2. Wash area with soap and water to remove remaining pesticide.
3. Follow washing with clean water rinse.
4. Do not allow runoff to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:
Nonrefillable Container (flexible-bag-all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by

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27

STORAGE AND DISPOSAL (Cont.)

State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid-fifty lbs. or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable Container (rigid-greater than fifty lbs.): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container one-fourth full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Refillable Container: Refillable container. Refill this container with sulfur only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

For Residential/Household Use:

PESTICIDE DISPOSAL: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty**, place in trash or offer for recycling if available. **If partially filled**, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY—CONDITION OF SALE

OUR Directions FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the Seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.