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Pm 15
728-86

Ms. Carol D. Campbell
Southland Pearson & Company
P.O. Box 7344
Mobile, AL 36607

JUL 6 1987

Dear Ms. Campbell:

Subject: Copper Sulfate Standard - Updated Formula;
Revised Labeling
Southland Pearson Rose Dust
EPA Registration No. 728-86
Your Submission Dated January 9, 1987

Your response to the Copper Sulfate Standard, providing a Formulator's Exemption Statement for the copper sulfate in the formulation, is acceptable. The updated formula statement has been included in our files. It is understood that the formula dated December 29, 1986 replaces previously accepted formulas for this product.

Revised labeling, incorporating language from the Sulphur, Copper Sulfate, Carbaryl, and Lindane Registration Standards and the Decision Document for Ethylene Bisdithiocarbamates (EBDCs) is acceptable* provided you:

1. Make the following changes before releasing the product for shipment bearing amended labeling:
 - a. Expand the "Avoid contact" statement under Hazards to Humans* to read:

Avoid contact with skin, eyes, or clothing.
 - b. Under Environmental Hazards, add:

Drift and runoff from treated areas may be hazardous to fish in neighboring areas.

Delete ". . . the crop, cover crop, or weeds"

*Also add the following: "PROTECTIVE MEASURES: Always apply pesticide with your back to the wind. Wear long-sleeved shirt, long pants, and rubber gloves. Wash gloves thoroughly with soap and water before removing. Change your clothes immediately after using this product and launder (next page) 94953:1:Mountfort:MF-9A:KENCO:07/01/87:07/10/87:feg:vo:dsq:cdb:

CONCURRENCES

SYMBOL	ORIGINATOR						
SURNAME							
DATE							

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separately from other laundry before reuse. Shower immediately after use."

2

Modify the timing statement to read:

Applications should be timed to coincide with periods of minimum bee activity, usually between late evening and early morning.


Delete the final paragraph in this section. It is redundant.

- c. Delete the Physical/Chemical Hazards statement since it is inappropriate for this product.
- d. Delete Endangered Species Restrictions and Farmworker Safety statements. These are not required for homeowner-use products.
- e. Under Directions For Use, delete "Subsequent planting of . . . crops." This does not apply to your product.
- f. Under Storage and Disposal, delete storage instructions that are unnecessary for small containers of dry material. Many of the proposed statements appear to be inappropriate. The correct Pesticide/Container Disposal statements for this product are:

Do not reuse container. Securely wrap in several layers of newspaper and discard in trash.

- g. Modify copper substatement on front panel to read "3.5%" instead of "3.7%."
2. Submit one (1) copy of final printed labeling to the Product Manager below, incorporating the above changes.
- A stamped copy of labeling is enclosed for your records.

Sincerely yours,

Richard F. Mountfort 
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosure



ACCEPTED with comments JUL 6 1987 EPA Reg. No. 728-86

ROSE DUST

(May Also Be Used As A Rose Spray)

INSECTICIDE-FUNGICIDE

ACTIVE INGREDIENTS:

Table listing active ingredients: Sulphur (98% through 325 mesh) 20.0%, Basic Copper Sulfate 6.5% (circled), Zineb 3.5%, Carbaryl 5.0%, Lindane 1.0%, and INERT INGREDIENTS 7%. TOTAL 100.0%.

*(metallic zinc equivalent .829%)

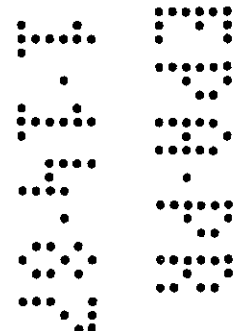
***(metallic copper equivalent (3.7%)) 3.4%

KEEP OUT OF REACH OF CHILDREN CAUTION

See Page One For Precautionary Statements

EPA Reg. No. 728-86 EPA Est. No. 728-AL-1

Net Contents:



Manufactured By: Southland Pearson & Company

PRECAUTIONARY STATEMENTS

Hazards To Humans And Domestic Animals

CAUTION: Harmful if swallowed. Avoid breathing dust or spray mist. Wash thoroughly after handling and before eating and smoking. May be absorbed through skin. Avoid contact with skin. May cause skin sensitization in certain individuals. Keep away from all contact with food or feed.

Add "PROTECTIVE MEASURES ... from mares and off for (BAC's)"

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person. IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated. IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water. IF IN EYES: Flush eyes with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Birds and other wildlife feeding in treated areas may be killed. Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes. This pesticide is highly toxic to bees exposed to direct treatment or to residues remaining on the treated area. Do not apply when bees are actively visiting the crop, cover crop, or weeds the treatment area.

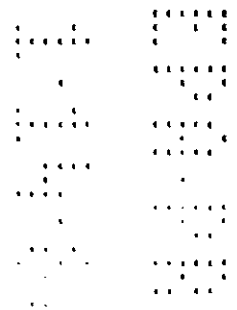
Do not apply directly to water. Do not apply when bees are actively visiting the crop, cover crop, or weeds the treatment area.

Applications should be timed to provide the maximum possible interval between treatment and the next period of bee activity. periods of maximum bee activity usually between late evening or early morning.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

Do not use pour, spill or store near heat or open flame.



ENDANGERED SPECIES RESTRICTIONS

It is a violation of Federal laws to use any pesticide in a manner that results in the death of an endangered species or adverse modification of their habitat.

The use of this product may pose a hazard to certain Federally designated endangered species known to occur in specific areas within the following counties:

STATE	SPECIES	BULLETIN NO.	COUNTY
California	Solano Grass	EPA/ES-85-13	Solano
Tennessee	Slackwater Darter	EPA/ES-85-04	Lawrence Wayne Hancock
	Freshwater Mussels	EPA/ES-85-07	Claiborne Hawkins Sullivan
Alabama	Slackwater Darter	EPA/ES-85-05	Lauderdale Limestone Madison
Virginia	Freshwater Mussels	EPA/ES-85-06	Grayson Smyth Scott Lee Washington

FARMWORKER SAFETY STATEMENTS

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 area about to be treated with this product. Oral warnings must inform workers of areas or fields that may not be entered without specific protective clothing until sprays have dried, and appropriate actions to take in case of accidental exposure, as described under Precautionary Statements on this label. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. CAUTION. Area treated with Basic Copper Sulfate on (date of application). Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure, flush eyes or skin with plenty of water. Call physician if irritation persists. Remove and wash contaminated clothing before reuse.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Subsequent planting of food ~~and~~ feed crops in treated soil must be made with crops on this or other ~~carbaryl~~ labels.

FOR USE AS A DUST

For best results, dust in early morning or late evenings when the temperature is low and the air is still. Apply dust so all exposed parts of plants are contacted especially upper and lower leaf surfaces. Repeat dusting at 5 to 10 day intervals or as necessary. Punch holes in lid of can and sift directly on plants. OR BETTER - apply with dust gun. Dust lightly but thoroughly, covering foliage.

FOR USE AS A SPRAY

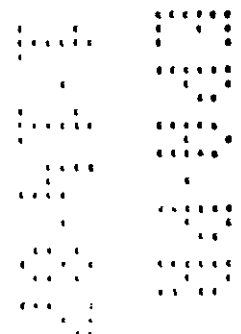
Use 1 lb. of ROSE DUST to 12 gallons of water. To make 1 gallon of spray 5 level tablespoonsful of dust. Mix well, then spray. Shake sprayer occasionally to keep powder in suspension. Be sure to wet under side of leaves.

DISEASES

Roses: Black Spot, Powdery Mildew, Rust, Snapdragon Rust, Carnation Leaf Spots.

INSECT PESTS

Aphids, Canker Worm, Cucumber Beetle, Flea Beetle, Flea Hopper, Japanese Beetle, Rose Chafer, Thrips (certain species), Red Spider.



STORAGE AND DISPOSAL

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

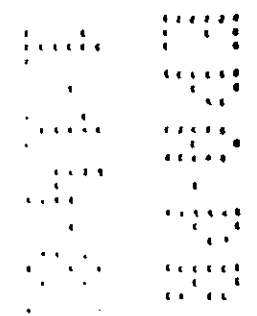
STORAGE INSTRUCTIONS: Storage should be under lock and key and secure from access by unauthorized persons and children. Storage should be in a cool dry area away from any heat or ignition source. Do not stack over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow material to become wet or store 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 water and soap 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: 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,

Use homeowner language



WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS 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. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel 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 Drexel Chemical Company and is accepted as such by the Buyer.

