

OCT 14, 1994

Phelps Dodge Refining Corporation
c/o Alice Walker, Ph.D.
Regulatory Consulting
47 Country Club Drive
Senatobia, MS 38668

Gentlemen:

Subject: Prohibition Against Use in Connecticut
Triangle Brand Copper Sulfate Instant Powder
EPA Registration No. 1278-5
Your Submission Dated August 30, 1994

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Modify the prohibition so it reads similar to the following:

State law prohibits the use of this product in sewage systems in the State of Connecticut.

The text you proposed could imply that the restriction is due to a federal prohibition.

b. Delete the Non-Agricultural Use Requirements Box. It bears statements that don't appear on the previously approved label and seem inappropriate for a product that is poured into a drain and immediately flushed.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

-2-

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



Cynthia Giles-Parker
Product Manager (22)
Fungicide Herbicide Branch
Registration Division (7505C)

Enclosure

cc: Stephen Morrill
Registration Support Branch
Registration Division (7505W)

JACKET 3 of 7

ACCEPTED
with COMMENTS
In EPA Letter Dated:

PHELPS DODGE REFINING CORPORATION
TRIANGLE BRAND
COPPER SULFATE INSTANT POWDER

OCT 14 1994

Not for medicinal use

| | |
|------------------------------------|--------|
| ACTIVE INGREDIENT: | |
| Copper sulfate pentahydrate* | 99.0% |
| INERT INGREDIENTS: | 1.0% |
| TOTAL | 100.0% |

1278-5

*Metallic copper equivalent 25.2%

KEEP OUT OF REACH OF CHILDREN

DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

Information for Right-to-Know States:

Copper sulfate pentahydrate: sulfuric acid, copper (2+) salt (1:1)/
CAS Reg. No. 7758-98-7; Water/CAS Reg. No. 7732-18-5

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol. Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.

IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention.

IF ON SKIN: Immediately wash skin with soap and plenty of water and get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth, and get medical attention.

EPA Reg. No. 1278-5

EPA Est. No. 1278-TX-1

Manufactured by
Phelps Dodge Refining Corporation
El Paso, Texas 79998

Net Weight
50 Lbs./22.68 Kg.

447

**PRECAUTIONARY STATEMENTS
DANGER
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Causes severe eye and skin irritation. Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing mist or dust and contact with skin, eyes, or clothing. Causes substantial but temporary eye injury. May cause skin sensitization reactions in certain individuals.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks, protective eyewear, and dust/mist filtering respirator (MSHA/NIOSH approval number TC-21C).

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to fish and aquatic organisms in adjacent sites. Direct application of copper sulfate to water may cause a significant reduction in populations of aquatic invertebrates, plants, and fish. Do not treat more than one-half of lake or pond at one time to avoid depletion of oxygen levels due to decaying vegetation. Allow one to two weeks between treatments for oxygen levels to recover.

Trout and other species of fish may be killed at application rates recommended on this label, especially in soft or acid waters. However, fish toxicity generally decreases when the hardness of water increases. Do not contaminate water when disposing of equipment washwaters. Consult your State Fish and Game Agency before applying this product to public waters. Permits may be required before treating such waters.

STORAGE AND DISPOSAL

**DO NOT CONTAMINATE WATER, FOOD,
OR FEED BY STORAGE OR DISPOSAL.**

STORAGE

Store unused product in original container only in a cool, dry area out of reach of children and animals. If container or bag is damaged, place the container or bag in a plastic bag. Shovel any spills into plastic bags and seal with tape.

DISPOSAL

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Open dumping is prohibited.

CONTAINER DISPOSAL: Do not reuse empty container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Place the pesticide into application equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. 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 a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

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

When used for household sewer treatment, keep children and pets away from treated area until material has been flushed down drain.

SEWER TREATMENT FOR ROOT AND FUNGUS CONTROL*

Phelps Dodge Refining Corporation Triangle Brand Copper Sulfate Instant Powder is effective in keeping sewer lines free of roots.

FOR PARTIAL STOPPAGE: Add 1/2 pound of Phelps Dodge Refining Triangle Brand Copper Sulfate Instant Powder to sewer or drain and flush toward blockage with 5 gallons of water. Repeat at 6 month intervals to prevent growth of new roots.

FOR COMPLETE STOPPAGE: Physically remove the root blockage and repeat as above.

*Not for use in Connecticut.

MIXING BORDEAUX MIXTURES

Phelps Dodge Refining Corporation Triangle Brand Copper Sulfate Instant Powder may be used as an ingredient in Bordeaux Mixture sprays as a fungicide to control some plant diseases. If a Bordeaux Mix is stated as 10-10-100, the first figure indicates the number of pounds of Copper Sulfate Instant Powder; the second is the number of pounds of Hydrated Spray Lime, and the third figure indicates the number of gallons of water to be used per acre.

To prepare a Bordeaux Mixture, fill the tank 1/4 full with water while the agitator is running. Wash the Phelps Dodge Refining Corporation Triangle Brand Copper Sulfate Instant Powder into the tank through a copper, bronze, stainless steel or plastic screen. Fill the tank 3/4 full with more water and wash the hydrated spray lime through the screen and then fill the tank. Agitate for several minutes to insure thorough mixing.

CHEMIGATION

Refer to supplemental labeling for use directions for chemigation. Do not apply this product through any irrigation system unless supplemental labeling on chemigation is followed. Supplemental labeling is entitled:

**Supplemental Labeling for Copper Sulfate Pentahydrate
EPA Reg. No. 1278-5
EPA Est. No. 1278-TX-1
Chemigation**

USING BORDEAUX MIXTURES WITH VARIOUS CROPS

ALMONDS, APRICOTS, PEACHES, NECTARINES: For Shot Hole Fungus, prepare a 10-10-100 Bordeaux Mixture and apply as a dormant spray in late fall or early spring.

ALMONDS, APRICOTS, CHERRIES, PEACHES, NECTARINES, PLUMS, PRUNES: For Brown Rot Blossom Blight, prepare a 10-10-100 Bordeaux Mixture and apply when buds begin to swell.

SOUR CHERRIES: For Leaf Spot, prepare a 10-10-100 Bordeaux Mixture and apply as a full coverage spray after petal fall or as recommended by State Extension Service.

LEMONS, ORANGES, GRAPEFRUIT: For Phytophthora Brown Rot, prepare a 3-4-5-100 Bordeaux Mixture where there is no history of copper injury, or a 3-2-6-100 (Zinc Sulfate-Copper Sulfate-Hydrated Lime-Gallons of Water) Bordeaux Mixture. Spray 6 gallons on skirt of tree 3 to 4 feet high, and 2 to 4 gallons on trunk and ground under the tree. If Phytophthora hibernalis is present, use 10 to 25 gallons to completely cover each tree. Apply in November or December just before or after first rain. In severe Brown Rot season, apply second application in January or February.

LEMONS, ORANGES, GRAPEFRUIT: For Septoria Fruit and Leaf Spot (central California), Brown Rot, zinc and copper deficiencies, prepare a 3-2-6-100 Bordeaux Mixture (Zinc Sulfate-Copper Sulfate-Hydrated Lime-Gallons of Water) and use 10 to 15 gallons to cover completely each tree. Apply in October, November or December just before or after first rain.

WALNUTS: For Walnut Blight, apply 15 pounds Copper Sulfate with 10 pounds of Hydrated Lime in 100 gallons of water plus 1/2 gallon summer oil emulsion. Apply in early pre-bloom and at 10% to 20% pistillate (not when catkin blooms are showing) just before or after rain. Use only if Bordeaux Mixture has been proven to be non-phytotoxic in your area.

OLIVES: For Peacock Spot and Olive Knot, prepare a 10-10-100 Bordeaux Mixture and apply in autumn before heavy winter rains to prevent Peacock Spot. In areas of less than 10 inches rainfall, use a 5-10-100 Bordeaux Mixture. To help protect against Olive Knot apply a 10-10-100 Bordeaux Mixture before heavy rains and again in the spring. Injury may occur in areas of less than 10 inches of rainfall.

LILIES: For Botrytis Blight, prepare a 10-10-100 Bordeaux Mixture and apply at beginning of emergence. Repeat at 7 to 10 day intervals. Apply more often during frequent rainfalls or when severe disease conditions occur.

NOTICE TO BUYER

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

DOT Hazard Class
RQ, Environmentally Hazardous Substances,
Solid, n.o.s., (Cupric Sulfate), UN 3077