

PM 21

2935-48

File 1/94



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 10 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Joanne Pratt  
WILBUR ELLIS CO.  
191 W. Shaw Avenue  
Fresno, CA 93704

Subject: Label Amendment Submission of 08/30/93 in Response to PR Notice 93-7  
EPA Reg. No. 2935-48  
RED-TOP DUSTING SULFUR

**IMPORTANT NOTICE:** This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**SERIOUS ERROR(S) ON SUBMITTED LABELING:**

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

**YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING.** Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

**YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.**



Recycled/Recyclable  
Printed with SoyCanola Ink on paper that  
contains at least 50% recycled fiber

Each notification must include the following information:

1. Registrant's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director  
Compliance Division, (7203)  
Worker Protection Notification  
Office of Compliance Monitoring  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

**IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.**

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the WPS labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have neither been reviewed nor accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

Submit the required notification. Then by the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling as amended

**AND**

- **WITHIN** one year from date of this acceptance.

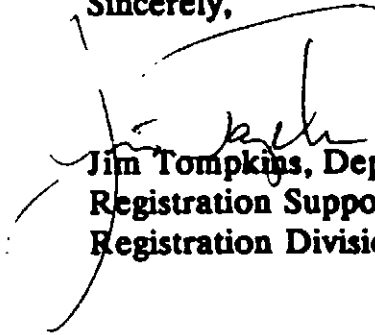
Submit the final printed labeling via the U.S. Postal Service to:

**Document Processing Desk (FIN-LABEL)  
 Office of Pesticide Programs (7505C)  
 U.S. Environmental Protection Agency  
 401 M Street, SW  
 Washington, D.C. 20460-0001**

Hand or courier deliveries of final labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
JAN 10 1994

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
2935-48

BEST AVAILABLE COPY



# DUSTING SULFUR

Copy A  
Copy B - Add  
Copy C

## DIRECTIONS FOR USE

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

## 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 area until at least 24 hours after the completion of application to the area unless wearing the protective clothing listed below. During early reentry into treated areas less than 24 hours after the completion of application to perform hand labor tasks, wear long pants (or coveralls), long-sleeved shirt, shoes, socks, chemical/water resistant gloves, goggles or face shield. Because certain states 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 should specify protective clothing, areas or fields that cannot be entered without the clothing, period of time area is to be vacated, and statement of practical treatment (see right) in case of exposure. 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. Warnings must include the following information: "Caution. Area treated with sulfur (or state of application). Do not enter without appropriate protective clothing for 24 hours. (Insert here action to take in case of accidental exposure)."

Pesticidal Hazards: During mixing, loading and application of this product, wear long pants (or coveralls), long sleeved shirt, shoes, socks, chemical/water resistant gloves and goggles or face shield.

## STORAGE AND DISPOSAL

1. **Prohibitions:** Do not contaminate water, food or feed by storage or disposal.
2. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
3. **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.
4. **Storage:** Store in original container only and keep sealed. Store in closed storage areas. Use caution when moving, opening, closing or pouring.

## RECOMMENDATIONS FOR USE

This material may be applied with ground equipment or aerial depending upon local conditions.

**CAUTION:** Applications of sulfur should not be made just prior to or during periods of high summer temperatures. Do not make applications within 2 weeks of an oil spray. Do not use, or spray the material to drift onto sulfur sensitive beans, Squash, Cucumbers, Apricots or other plants which may be injured by sulfur.

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

For control of MITES, use higher rates shown under conditions of high pest pressure. For control of FUNGI, use higher rates shown when weather conditions indicate a potential for increased pest pressure.

**ALFALFA:** For the control of POWDERY MILDEW, TWO-SPOTTED MITE, PACIFIC MITE and STRAWBERRY MITE (Asteric line) — Use 30 to 50 lbs. per acre. Apply when disease first appears and repeat at 14-day intervals or as necessary.

**ALMONDS, CHERRIES, HECTARINES, PEACHES, PLUMS and PRUNES:** For the control of BROWN ROT BLOSSOM BLIGHT, PEACH CANKER, SHOTHOLE, SILVER MITE, STEB BLIGHT, CHERRY LEAF SPOT, PRUNE RUST and POWDERY MILDEW — Use at the rate of 35 to 60 lbs. per acre in pre-bloom, bloom and post-bloom periods. Apply when disease threatens during rain periods and repeat at 7-10 day intervals.

**APPLES and PLUMS:** For control of SCAB and POWDERY MILDEW — Use 40 to 50 lbs. per acre. Apply in pre-bloom, bloom and post-bloom periods. On pears do not apply after the fruit begins to turn down.

**ARTICHOKES (GLOBE, JERUSALEM, CHINESE):** LEAF SPOT — Use 25 to 35 lbs. per acre. Begin when disease first appears and repeat at 7-10 day intervals or as necessary.

**ASPARAGUS:** For control of RUST and ASPARAGUS MITE — Use 40 to 50 lbs. per acre. Dust after cutting stalks, irrigate, cultivate, then apply the sulfur. Repeat at 7-10 day intervals through season.

## ACTIVE INGREDIENT:

Sulfur ..... 99%

## INERT INGREDIENTS:

1%

TOTAL 100%

EPA Reg. No. 2935-48-AA

EPA Est. No. 2935-CA-1

## KEEP OUT OF REACH OF CHILDREN

## CAUTION:

NOT FOR USE OR STORAGE IN OR AROUND THE HOME

Copy A - move

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing dust.

### STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Call a physician or poison control center. Promptly drink one or two glasses of water and induce vomiting by touching back of throat with fingers. Do not induce vomiting or give anything by mouth to an unconscious person.

If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

If in Eyes: Flush eyes with a gentle steady stream of water for 15 minutes. Get medical attention.

If On Skin: Wash with plenty of soap and water. Get medical attention if irritation persists.

Copy C - move

## ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from treated areas.

### PHYSICAL HAZARD

Sulfur dust suspended in air ignites easily. Keep away from heat, sparks or flame. Do not smoke while applying this product.

## RECOMMENDATIONS FOR USE (cont.)

**BEANS and PEAS:** For the control of POWDERY MILDEW, LEAF SPOT RUST, SPIDER MITES and THRIPS — Use 15 to 35 lbs per acre. Apply when disease first appears and repeat as necessary.

**BEETS:** RUST — Use 20 lbs. per acre. Apply at first signs of disease. Repeat at 7-10 day intervals or as necessary.  
**BLACKBERRIES, BLUEBERRIES, CURRANTS, DEWBERRIES, GOOSEBERRIES, HUCKLEBERRIES, LOGANBERRIES, RASPBERRIES:** POWDERY MILDEW — Use 20 to 30 lbs. per acre. Begin when new shoots are 5 inches long and before blossoms open. Repeat at 10-day intervals or as necessary.

**BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER, COLLARDS, KALE, PUTABAGAS, TURNIPS:** POWDERY MILDEW — Use 20 to 25 lbs. per acre. Begin at first sign of disease. Repeat at 7-10 day intervals or as necessary.

**CARROTS:** For the control of PETROBIA MITE, POWDERY MILDEW and RUST — Use 20 to 50 lbs. per acre.

**CELERY:** EARLY AND LATE BLIGHT — Use 8 to 12 lbs. per acre. Begin as soon as plants emerge. Repeat at 7-10 day intervals or as necessary.

**CITRUS:** For the control of CITRUS THRIPS, CITRUS FLAT MITE, YUASA SPIDER MITE, SIX-SPOTTED MITE and CITRUS RUST MITE — Use 100 to 125 lbs. per acre. Apply when pests first appear and repeat as necessary. Do not use with 21 days of an oil spray treatment.

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**AVOCADOS: MITE SUPPRESSION** — Use 40 to 50 lbs. per acre. Apply when mites first appear and repeat as necessary.

**BARLEY, OATS: RUST** — Use 25 to 40 lbs. per acre. Apply at first sign of disease. Repeat at 7-10 day intervals.

**COTTON: For the control of STRAWBERRY (Aromatic) MITE** — Use 30 to 40 lbs. per acre when mites first appear and repeat as necessary.

**COWPEAS: RUST** — Use 5 to 25 lbs. per acre. Begin soon after seedlings emerge. Repeat at 7-10 day intervals through season.

**CUCUMBERS, PUMPKINS, SQUASH: To control POWDERY MILDEW and SCAB** — Apply 10 to 35 lbs. per acre. Begin when first true leaves appear and repeat at weekly intervals. Note to user: Sulfur may injure certain varieties of cucurbits.

**DATES: To control BANKS GRASS MITES** — Use 50 to 125 lbs. per acre, applying by ground or air. Use the higher rates by air. Thorough coverage is essential for good control.

**EGGPLANTS: POWDERY MILDEW** — Use 20 to 35 lbs. per acre. Begin when first true leaves appear. Repeat at weekly intervals.

**FIGS: For control of FIG RUST MITE in spring and early summer** — Dust at 40 to 50 lbs. per acre when damage to foliage (freezing) appears. A second application may be necessary.

**FLAX: POWDERY MILDEW** — Use 20 to 30 lbs. per acre. Begin at first sign of disease. Repeat at 7-10 day intervals or as necessary.

**GARLIC: DOWNY and POWDERY MILDEW** — Use 20 to 35 lbs. per acre. **PETROBIA MITE** — Use 25 to 30 lbs.

**GRAPES: For control of POWDERY MILDEW and RUST** — Use 10 to 40 lbs. per acre. Make first application when shoots are 6 in. to 8 in. long. Make a second application when shoots are 12 in. to 15 in. long and third about 14 days later. Repeat applications at 10-14 day intervals to protect new growth. Avoid over-applications in hot weather. Concord and other muscadine type grapes may be injured by sulfur.

**GRASS SEED CROPS: TIMOTHY MITES** — Use 30 lbs. per acre. Apply when mites first appear and repeat as necessary.

**HOPS: SPIDER MITE SUPPRESSION** — Use 30 to 50 lbs. per acre. Apply when mites first appear and repeat as necessary.

**LETTUCE: POWDERY MILDEW** — Use 10 to 15 lbs. per acre. Begin at first sign of disease. Repeat as necessary.

**MELONS: Use 15 to 50 lbs. per acre for control of POWDERY MILDEW and SCAB. Powdery Mildew may be controlled by dusting but the sulfur often injures the vines, particularly if the temperature reaches 95°F. Treat when disease first appears. Use 30 to 50 lbs. per acre to control SPIDER MITES. DO NOT USE ON SULFUR SENSITIVE VARIETIES.**

**OLIVES: For control of OLIVE MITE** — Apply 50 to 70 lbs. per acre. Do not use sulfur in hot weather as damage may result to crop and foliage.

**ONIONS: For control of PETROBIA MITES, BOTRYTIS BLIGHT and POWDERY MILDEW** — Use 20 to 50 lbs. per acre. This product may be applied by air or ground equipment. Apply when disease first appears and repeat at 14-day intervals or as necessary.

**PEANUTS: LEAF SPOT, POWDERY MILDEW** — Use 20 to 25 lbs. per acre. Begin when plants are 40 days old or when first spots appear on lower leaves. Repeat at 10-14 day intervals and after rain. **RUST** — Use 20 to 30 lbs. per acre. Apply when disease threatens. Repeat at 7-10 day intervals or as necessary.

**PEPPERS: POWDERY MILDEW** — Use 20 to 35 lbs. per acre. Begin before disease appears. Repeat at weekly intervals.

**PISTACHIOS: To aid in the control of MITES** — Use 50 lbs. per acre, making ground or air applications. This product may be applied to non-bearing and bearing Pistachio trees up to the day of harvest.

**POMEGRANATES: To control MITES** — Use 50 lbs. per acre, applying by ground or air. Apply when mites first appear and repeat as necessary to maintain control. There is no time limitation between application and harvest.

**POTATOES: POWDERY MILDEW** — Use 5 to 15 lbs. per acre. Apply before disease appears. Repeat at 7-10 day intervals or as necessary.

**QUINCE: BROWN ROT, POWDERY MILDEW, SCAB** — Use 35 to 50 lbs. per acre. Begin before diseases are expected to appear. Repeat at 7-10 day intervals or as necessary.

**RUTABAGAS: POWDERY MILDEW** — Use 15 to 30 lbs. per acre. Repeat at 7-14 day intervals.

**SOYBEANS: LEAF SPOT, POWDERY MILDEW** — Use 8 to 15 lbs. per acre. Apply at first sign of disease. Repeat at 7-10 day intervals.

**CLOVER: POWDERY MILDEW, RUST, SPIDER MITES** — Use 15 to 25 lbs. per acre. Begin when crop is in bud stage or at first sign of disease or mites. Repeat at 7-10 day intervals or as necessary.

**SPINACH: POWDERY MILDEW, RUST** — Use 5 to 30 lbs. per acre. Apply when disease first appears. Repeat at 7-10 day intervals.

**STRAWBERRIES, RASPBERRIES and BOYSENBERRIES: For the control of POWDERY MILDEW** — Use 3 to 50 lbs. per acre. Apply when disease first appears and repeat as necessary.

**SUGAR BEETS: For the control of POWDERY MILDEW, TWO-SPOTTED MITE, PACIFIC MITE and STRAWBERRY MITE (Aromatic Mite)** — Use 35 to 50 lbs. per acre. Apply when disease first appears and repeat at 14-day intervals or as necessary.

**TOMATOES: For the control of TOMATO RUSSET MITE and POWDERY MILDEW** — Use 20 to 50 lbs. per acre.

**YETCH: RUST** — Use 25 to 40 lbs. per acre. Begin at first sign of disease. Repeat at 7-10 day intervals.

**WALNUTS: SPIDER MITES** — Use 40 to 50 lbs. per acre. Repeat if necessary. Check tolerance prior to using. Consult local agricultural authorities as to the effectiveness of sulfur on Spider Mites.

**WHEAT: For the control of POWDERY MILDEW** — Use 35 to 50 lbs. per acre. Apply when disease first appears and repeat at 14 day intervals or as necessary.

**ORNAMENTALS: POWDERY MILDEW, RUST, LEAF SPOTS** — Use 20 to 40 lbs. per acre. Dust for complete coverage on both sides of leaves, applying when disease first appears and repeat at 5-10 day intervals and after rain, or as necessary. Keep new growth protected. **AVOID APPLICATION TO SULFUR-SENSITIVE PLANTS.**

**ASTERS, CARNATIONS: For control of POWDERY MILDEW and RUST.**

**CALCENDULAS, CEDARS, CHERRY LAURELS, CHRYSANTHEMUMS, HOLLYHOCK, JUNIPER, SMILAX, SPRUCE** — For control of LEAF SPOT and POWDERY MILDEW.

**CLEMATIS, COLUMBINE, ENGLISH IVY, LAUREL, PETUNIA, SAGE: For control of LEAF SPOT**

**COSMOS, CREPE MYRTLE, DAHLIA, DELPHINIUM, DOGWOOD, ELYSIUMUS, GLADIOLUS, GOLDEN FLEECE, HIBISCUS, HOLLY, LADY'S MANTLE, LIGUSTRUM, LILAC, POPLARS, SILVER VINE, SPIREA, SUNFLOWER, SWEET PEA, VERBENA, VIOLETS, WILLOW, ZEBRAS: For the control of POWDERY MILDEW.**

**ROSES: For control of BLACK SPOT, POWDERY MILDEW, RUST.**

**NOTICE:** The statements made on this label are believed to be true and accurate, but because of conditions of use which are beyond our control, WILBUR-ELLIS COMPANY does not make, nor does it authorize any agent or representative to make, any warranty, guarantee or representation, expressed or implied, concerning this material or the use thereof, except in conformity with the statements on the label. Neither WILBUR-ELLIS COMPANY nor the seller shall be held responsible in any manner for any personal injury or property damage or loss resulting to the buyer or to the other person from handling, storage or use of this material, not in accordance with directions. The buyer assumes all risk and liability resulting from improper handling, storage or use and accepts and uses this material on these conditions.

Logo TM of WILBUR-ELLIS Company  
IDEAS TO GROW WITH is a registered trademark of WILBUR-ELLIS Company

5483

In Case of Emergency, Call CHEMTREC: (800) 424-9300

NET CONTENTS: 50 POUNDS

WILBUR-ELLIS COMPANY  
P.O. BOX 16458  
FRESNO, CA 93755

**BEST AVAILABLE COPY**

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COPY D

**DIRECTION 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 Protective Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontaminations, notification, and emergency assistance.

It also contains specific instructions, and exceptions pertaining/protective equipment (PPE). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

*missing language*

Do not enter or allow workers 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:

- A) Coveralls
- B) Waterproof gloves
- C) Shoes plus socks

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**COPY B**

**Personal Protective Equipment**  
Applicators and other handlers must wear:

- A) Long sleeved shirt
- B) Long pants
- C) Waterproof gloves
- D) Shoes plus socks

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.