



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Linda Pearce
Registration Specialist
Regulatory Affairs
Wilbur-Ellis
191 W. Shaw Avenue, Suite 107
Fresno, CA 93704-2876

SEP 26 2001

Dear Ms. Pearce:

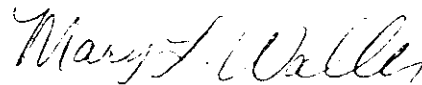
Subject: Ben-Sul 60 Dust
EPA Registration Number 2935-246
Your Submission Dated 5/16/01

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided the following changes are made:

1. Move the phrase "Not for use or storage in and around the home" so that it appears under the Agricultural Use Requirements box.
2. Move the phrase "In case of a chemical emergency, call ChemTrec . . ." so that it appears at the end of the Storage and Disposal section. ChemTrec does not provide information relative to first aid for human exposures. ChemTrec provides information on accidental spills and disposal.
3. Change the header "Recommendations" to "Crops and Application Rates" as crops and application rates are not recommendations but rather, are mandatory language.
4. Move the Storage and Disposal section so that it appears at the end of the Directions for Use section. In the Storage and Disposal section, change the subheading "General" to "Pesticide Storage", and reorder the subheadings and information as follows: Pesticide Storage, Pesticide Disposal and Container Disposal.

A stamped copy of the label is enclosed for your records. Please submit one copy of your final printed labeling before you release the product for shipment.

Sincerely,



Mary L. Waller
Product Manager 21
Fungicide Branch
Registration Division (7505C)

Enclosure



BEN-SUL 60 DUST

ACTIVE INGREDIENT	% By Wt.
Sulfur	60.00%
INERT INGREDIENT	40.00%
TOTAL	100.00%

EPA Reg. No. 2935-246 EPA Est. No. 2935-CA-1

KEEP OUT REACH OF CHILDREN

CAUTION:

NOT FOR USE OR STORAGE IN OR AROUND THE HOME

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 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 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

IN CASE OF A CHEMICAL EMERGENCY,
CALL CHEMTREC 24-HOUR NUMBER: (800) 424-9300

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT

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. Applicators and other handlers must wear: A) Long-sleeved shirt and long pants; B) Chemical-resistant gloves made of any waterproof material such as Polyethylene or polyvinyl chloride; C) 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.

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 wash waters. Do not apply when weather conditions favor drift from treated areas.

PHYSICAL AND CHEMICAL HAZARDS

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

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, forests, 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), notification to workers, 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: A) Coveralls; B) Chemical-resistant gloves made of any waterproof material; C) Shoes plus socks.

USER SAFETY RECOMMENDATIONS

User 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.
- 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.

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 area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

USE PRECAUTIONS

Some fruits and other plants are susceptible to injury from sulfur under certain climatic conditions. The user is advised not to use sulfur on any crop unless local use has proved that sulfur does not damage crops in that locality. Sulfur may burn foliage when the temperature is high (90 degrees F or above). Do not make sulfur applications at such times. Do not use this product for any purposes other than recommended on this label.

Do not use within 2 weeks of an oil spray treatment. When growing crops for processing, consult the processor before applying sulfur. Consult your State Agricultural Experimental Station or your State Agricultural Extension Service for additional information consistent with label cautions and directions.

RECOMMENDATIONS FOR USE:

This material is recommended for application by ground or air.

Where recommended for prevention of Powdery Mildew, apply when disease first appears and repeat at 7 to 10 day intervals throughout the growing season. Shorten the interval during humid, rainy weather. The "Brown Rot" referred to throughout this label is Monilinia Brown Rot blossom blight.

Where recommended for prevention of Brown Rot, apply at pink bud or popcorn stage during bloom and at petal fall, shuck split and shuck fall. Repeat at 10-14 day intervals in cover sprays as long as necessary. For mites, apply when pests appear and repeat as necessary. Use lower rates during periods of higher temperatures.

ALMONDS, CHERRIES, NECTARINES: For the control of Brown Rot, Cherry Leaf Spot, Rust (Tranzschella) and Powdery Mildew use at the rate of 40 to 80 lbs. per acre. Apply as described above when disease threatens during rain periods and continue through rainy season.

ALFALFA: For the control of Atlantic Mite, Spider Mite and Clover Mite use 30 to 50 lbs. per acre.

ASPARAGUS: For control of Rust use 25 to 60 lbs. per acre. Dust after cutting stops, irrigate, cultivate, then apply the sulfur. Repeat at 7 to 10 day intervals.

APPLES and PEARS: For control of Scab and Powdery Mildew use 65 to 80 lbs. per acre. Apply in pre-bloom, bloom and post-bloom periods. On pears do not apply after the fruit begins to turn down.

BEANS: For the control of Pacific Mite (Red Spider) use 25 lbs. per acre. For control of Powdery Mildew use 40 to 50 lbs. per acre. Certain varieties of beans may be injured by sulfur.

CARROTS and ONIONS: For the control of Petrobia Mite use 15 to 65 lbs. per acre.

CITRUS: For the control of Citrus Thrips, Citrus Flat Mite, Yuma Spider Mite, Six-Spotted Mite and Citrus Rust Mite use 65 to 210 lbs. per acre. Apply when pests first appear and repeat as necessary. Do not use within 21 days of an oil spray treatment.

CORN: For the control of Spider Mites use 30 to 50 lbs. per acre.

COTTON: For control of Atlantic Mite and Flea Hopper apply 10 to 65 lbs. per acre.

FIGS: For control of Fig Rust Mite in spring and early summer. Dust at 65 lbs. per acre when damage to foliage (russetting) appears. A second application may be necessary.

GRAPES: For the control of Powdery Mildew use 8 to 35 lbs. per acre. Make first application when shoots are 6 to 8 inches long. Make a second application when shoots are 12 to 15 inches long and the third about 14 days later. Repeat applications at 10 to 14 day intervals to protect new growth. Avoid applications during hot weather as injury may occur. Concord and other Labrusca type grapes may be injured by sulfur.

HOPS: For control of Red Spider Mites use 30 to 50 lbs. per acre.

MELONS: Use 35 to 40 lbs. per acre for control of Powdery Mildew. Powdery Mildew may be controlled by dusting but the sulfur often injures the vines, particularly if the temperature reaches 95 degrees F. Treat when disease first appears. Use 50 to 80 lbs. per acre to control Spider Mites. DO NOT USE ON SULFUR SENSITIVE VARIETIES.

OLIVES: For control of Olive Mite. Apply 80 to 115 lbs. per acre. Do not use sulfur in hot weather as damage may result to crop and foliage.

PEACHES: For the control of Peach Silver Mite, Powdery Mildew and prevention of Brown Rot of fruit apply 50 to 80 lbs. per acre. For prevention of Brown Rot of fruit apply when fruit begins to ripen.

PISTACHIOS: Citrus Flat Mite, use 50 to 85 lbs. per acre. Apply when mites first appear and repeat as necessary. This product may be applied to bearing or non-bearing trees up to the day of harvest.

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STORAGE AND DISPOSAL

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

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.

General: Store in original container only and keep sealed. Store in closed storage areas. Use caution when moving, opening, closing or pouring.

FOR ALL CROP USES LISTED ON THE PRODUCT LABEL (for both ground and air applications)

Dusting Sulfur can create situations where drift to nontarget or sensitive areas can occur. To minimize the occurrence of drift incidents, the following conditions must be met:

DIRECTIONS FOR USE (GENERAL)

In addition to specific instructions under directions for use on the main sulfur label, the following conditions must also be followed for use in California:

1. The operator of the property and the applicator must establish a buffer zone of enough distance to prevent drift onto nontarget areas such as hospitals, clinics, schools, residential areas and any other area designated by county agricultural commissioner.

2. The operator of the property and the applicator must evaluate the method and equipment for each site to ensure proper and safe use. Evaluations shall include, but not be limited to the appropriateness of ground or air application.

3. Sulfur shall not be applied when the wind velocity exceeds 10 miles per hour. Applicators should be aware that in some areas of California, "dead calm" conditions are often associated with an inversion situation. In these areas applying sulfur when there is a minimum air movement of 2 miles per hour will help insure that an inversion situation does not exist.

4. All applicators, prior to use of dust formulations, should read and understand the Best Application Practices Manual.

5. Before using this product, read and follow all applicable directions, restrictions, and precautions on the EPA-registered label.

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, guaranty 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.

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F-501

NET CONTENTS: 50 POUNDS

IN CASE OF CHEMICAL EMERGENCY,
CALL CHEMTREC: (800) 424-9300

Distributed by:



IDEAS TO GROW WITH®

P.O. BOX 16458 - FRESNO, CA 93755

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

9/26/01

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

2935-246