



Reg # 2935-399

PM-18

File
126

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

JAN 31 1994

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 08/30/93 in Response to PR Notice 93-7
EPA Reg. No. 2935-399
RED TOP BT-320 SULPHUR 25% DUST

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 reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (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 not been reviewed or 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:

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

BEST AVAILABLE COPY



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 30% recycled fiber

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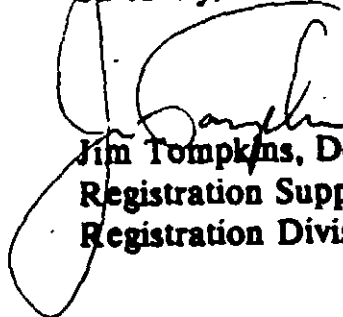
Submit the final printed labeling via the U.S. Postal Service to:

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 printed 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

BEST AVAILABLE COPY

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Joanne Pratt
WILBUR ELLIS CO.
191 W SHAW AVE
FRESNO CA 93704

Subject: Label Amendment Submission of 08/30/93
to Comply with WPS Labeling Requirements
EPA Reg Nr. 2935-399
RED TOP BT-320 SULPHUR 25% DUST

The following specific comments pertain to your
WPS labeling submission concerning the product
cited above:

You have incorrect wording in the first paragraph in the
Agricultural Use Requirements box on your proposed label.
That paragraph must contain the exact wording of the
paragraph shown as "2" in Section F on Part 2 of the Product
Worksheet in Supplement Three-A to PR Notice 93-7.

You have incorrect wording in the second-to-last sentence in
the first paragraph in the Agricultural Use Requirements box
on your proposed label. The sentence must be as follows:
"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."

There is a typographical error(s) in the Agricultural Use
Requirements box.

96 H

WILBUR-ELLIS

BT 320 SULFUR 25 DUST

(BACILLUS THURINGIENSIS)

Copy B - Add
Copy C
Copy D - Add

DIRECTIONS FOR USE

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

RE-ENTRY STATEMENTS

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 areas without protective clothing until dust has settled. 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 should specify protective clothing, areas or fields that cannot be entered without this clothing, period of time area is to be vacated, and statement of practical treatment 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 Bacillus Thuringiensis and Sulfur on (date of application). Do not enter without appropriate protective clothing until dusts have settled. (insert here action to take in case of accidental exposure)."

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. Store in cool place.

Apply recommended amounts when air is calm, using ground equipment, aircraft or hand dustec. Apply at first sign of infestation and repeat at weekly intervals when needed to maintain control. Good underleaf coverage is essential since the insect must ingest BT 320 Sulfur 25 Dust. After eating BT 320 Sulfur 25 Dust, some insects stop feeding but may otherwise appear to be unaffected for several days. Use the higher recommendations against very heavy infestations, or where it is difficult to obtain good coverage due to rank foliage. BT 320 Sulfur 25 Dust is exempt from tolerance requirements, and may be applied in recommended amounts up to the day of harvest.

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 allow this material to drift onto sulfur sensitive Melons, Squash, Cucumbers, Apricots, Spinach or other plants which may be injured by sulfur. Concord and other labruca type grapes may be injured by sulfur.

RECOMMENDATIONS

Do not mix or dilute with other products.
Thorough coverage essential when using BT 320 Sulfur 25 Dust.

BEST AVAILABLE COPY

ACTIVE INGREDIENTS:

Bacillus thuringiensis subspecies berliner
Lepidopteran active toxin(s)
Sulfur

INERT INGREDIENTS

Potency: 145 million International Units per pound of this product
adjust use rates beyond those specified in the Directions for Use

EPA Reg. No. 2935-399-AA

CAUTION KEEP OUT OF REACH OF

Copy C - move **ENVIRONMENTAL HAZARD**
Do not contaminate water when disposing of equipment washwater.
ONLY FOR SALE TO, USE, AND STORAGE BY AGRICULTURISTS

RECOMMENDATIONS (continued)

Crop	Pest
BROCCOLI, CABBAGE	Cabbage looper
COLLARDS, KALE	Imported cabbageworm
MUSTARD GREENS	
CAULIFLOWER	Cabbage looper
	Imported cabbageworm
COTTON	Cabbage looper
CELERY, LETTUCE	Cabbage looper
POTATOES, SPINACH	Cabbage looper
TOMATOES	Cabbage looper
	Tomato Hornworm
TURNIP GREENS	Imported cabbageworm
GRAPES	Grape Leaf Folder
	Powdery Mildew
GRAPES (California)	Grape Leaf Folder
	Omnivorous Leaf Miner
	Powdery Mildew

Start treating as soon as possible after hatching and before
Apply by ground equipment to obtain thorough coverage of
OMNIVOROUS LEAF ROLLER and GRAPE LEAF FOLDER
6 applications apply 12.5 to 25 lbs. per acre for each applica
For POWDERY MILDEW control, this product may be substituted
to 10 day application of Dusting Sulfur. But this product
Powdery Mildew other than in a scheduled program.

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.

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 to protective equipment (PPE). 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 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