

DEC 9 1999

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

Dear Ms. Pearce:

Subject: Bt 320 Sulfur 25 Dust
EPA Reg. No. 2935-399
Application for an amendment dated September 17, 1999

On September 17, 1999, you submitted an application to amend the subject product and label. Revisions are made to:

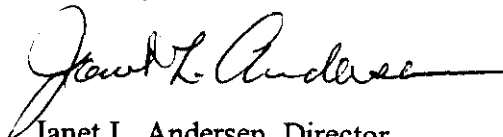
- 1) Add sugar beets as a use site

The label amendment referred to above is acceptable under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, subject to the following comment:

- 1) The Agency is currently reviewing acute toxicity data submitted by Wilbur-Ellis Co. in response to the Sulfur RED (MRID #s 424224-01 and 424353-01). Pending the results of this review, the precautionary and first aid label statements may need to be revised.

A stamped copy of the label for the subject product is enclosed for your records.

Sincerely,



Janet L. Andersen, Director
Biopesticides and Pollution
Prevention Division (7511C)

Enclosure

CONCURRENCES							
SYMBOL	7511C	7511C					
SURNAME	Reynolds	HUTTON					
DATE	11/30/99	12/6/99					



BT 320 SULFUR 25 DUST

2/2

(BACILLUS THURINGIENSIS)

ACTIVE INGREDIENTS:

Bacillus thuringiensis subspecies berliner	
Lepidopteran active toxins	0.064%
Sulfur	25.000%
INERT INGREDIENTS	74.936%
	100.00%

There is no direct relationship between intended activity (potency) and the Percent Active Ingredient by Weight.

Potency: 145 Million International Units per pound of this product.
Potency units should not be used to adjust use rates beyond those specified in the Directions for Use section.

EPA Reg. No. 2935-399

EPA Est. No. 2935-CA-1

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.

Apply recommended amounts when air is calm, using ground equipment, aircraft or hand duster. 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.

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

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 Labrusca type grapes may be injured by sulfur.

RECOMMENDATIONS

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

CROP	PEST	LBS. PER ACRE
Broccoli, Cabbage	Cabbage looper	20 - 40
Collards, Kale, Mustard Greens	Imported cabbageworm	20 - 35
Cauliflower	Cabbage looper Imported cabbageworm	20 - 50 20 - 40
Cotton	Cabbage looper	25 - 50
Celery, Lettuce	Cabbage looper	20 - 50
Potatoes, Spinach	Cabbage looper	20 - 40
Sugar Beets	Powdery Mildew Two-Spotted Mite Pacific Mite Strawberry Mite	35 - 50
Tomatoes	Imported cabbageworm Tomato Hornworm	20 - 40
Turnip Greens	Imported cabbageworm	20 - 35
Grapes	Grape Leaf Folder Powdery Mildew	20 - 50
Grapes (California)	Grape Leaf Folder Omnivorous Leaf Roller Powdery Mildew	20 - 50

Start treating as soon as possible after hatching and before larvae are protected by leaf folds. Apply by ground equipment to obtain thorough coverage of leaf surfaces. For the control of OMNIVOROUS LEAF ROLLER and GRAPE LEAF FOLDER with a scheduled program of 4 to 6 applications, apply 12.5 to 25 lbs. per acre for each application.

For POWDERY MILDEW control, this product may be substituted for a regularly scheduled (7 to 10 day) application of Dusting Sulfur. But this product is not intended for use to control Powdery Mildew other than in a scheduled program.

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 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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ACCEPTED with COMMENTS
In EPA Letter Dated **NET CONTENTS = 50 POUNDS**

F-1199

KEEP OUT OF THE REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Causes moderate eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID

- IF SWALLOWED: Call a physician or poison control center. Drink 1-2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.
- IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.
- 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 plenty of water. Call a physician if irritation persists.

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.

As a general precaution when exposed to potentially high concentrations of living microbial products such as this, all mixer/loaders and applicators must wear a dust/mist filtering respirator meeting NIOSH standards of at least N-95, R-95, or P-95.

ENVIRONMENTAL HAZARDS

Do not contaminate water when disposing of equipment washwaters.
ONLY FOR SALE TO, USE, AND STORAGE BY AGRICULTURAL AND SERVICE PERSONS.

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) 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) Waterproof gloves; C) Shoes plus socks.

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.
- 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.

WILBUR-ELLIS COMPANY
P.O. Box 16458 - Fresno, CA 93755

DEC 9 1999
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2935-399
IN CASE OF EMERGENCY, CALL CHEMTREC: (800) 424-9300