



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. 2935-407
GOLDEN-DEW

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 SoyCanada 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.**

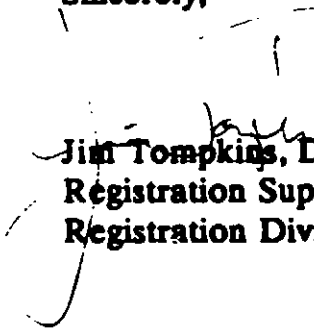
Submit the final printed labeling via the U.S. Postal Service to:

**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

ACCEPTED
10-15-92
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2935-407

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2935-407

WILBUR-ELLIS
GOLDEN-DEW®
(FUNGICIDE AND INSECTICIDE)

ACTIVE INGREDIENT:	BY WT.
SULFUR.....	92.0%
INERT INGREDIENTS:.....	8.0%
	TOTAL 100.0%

Golden Dew® is a Registered Trademark of Wilbur-Ellis Company
EPA Reg. No. 2935-407-AA EPA Est. No. 2935-CA-1

KEEP OUT OF THE REACH OF CHILDREN

CAUTION:

Move to "A" PRECAUTIONARY STATEMENTS:
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed, inhaled, or absorbed through skin. Avoid breathing dust, vapor, or spray mist. ~~Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.~~

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.

BEST AVAILABLE COPY

"A"
Add copy B

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 HAZARD

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

Replace with
Copy D

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 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 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 statements 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 Sulfur on (date of application). Do not enter without appropriate clothing until sprays have settled. (Insert here action to take in case of accidental exposure)."

Pesticide Handlers: 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 a face shield.

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MIXING INSTRUCTIONS: Pour recommended amount of this material into 1/3 filled spray tank. Add balance of water to fill tank. Keep agitator running during filling and spraying operations. Do not allow mixture to stand. Do not use in low-volume gear-type spray equipment.

WATER VOLUME: USE DESIGNATED AMOUNT OF PRODUCT IN THE FOLLOW GALLONS OF WATER PER ACRE.

GROUND APPLICATION: 40 to 50 gallons per acre.

AIR and CONCENTRATE APPLICATION: 3 to 20 gallons per acre.

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

IMPORTANT: The desired ratio of GOLDEN-DEW to water should be 1 to 2 pounds per gallon of water, but should not exceed 2 pounds per gallon.

Do not use within 2 weeks of an oil spray treatment; on citrus within 21 days.

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

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

Consult with State Agricultural Experiment Station or State Agricultural Extension Service personnel for additional information consistent with label cautions and directions.

COMPATIBILITY: Golden-Dew is compatible with most pesticides. Because conditions vary, a small amount of the pesticide should be mixed prior to application to examine their compatibility. ALWAYS ADD THE PESTICIDE INTO THE MIXED GOLDEN-DEW.

Sulfur will cause severe fruit and leaf injury to sulfur sensitive crops. Do not allow this material to drift onto sulfur sensitive Melons, Squash, Cucumbers, Apricots or other plants which may be injured by sulfur.

Do not apply when shade temperatures exceed or are likely to exceed 90°F. Sulfur may burn foliage and fruit during periods of high temperatures and under certain climatic conditions.

RECOMMENDATIONS FOR USE:

Alfalfa: For control of LYGUS, PACIFIC MITE and STRAWBERRY MITE -- Use 10 to 20 pounds per acre. Apply when pests first appear. Repeat at 1 to 2 week intervals.



ALMONDS: For suppression of **BROWN ALMOND, EUROPEAN RED, TWO SPOTTED, PACIFIC AND STRAWBERRY (ATLANTIC) MITES-** Apply 3 to 5 lbs. per 100 gallons of water. Apply when infestation first occurs and repeat as necessary. For control of **SCAB-** Apply 6 lbs. per 100 gallons of water. Apply 5 weeks after petal fall. Do not apply within 10 days of an oil application.

APPLES: SCAB, POWDERY MILDEW - Apply 4 to 5 lbs. per 100 gallons of water. Apply from pink or pre-blossom spray through second cover spray. Add 1 gallon lime sulfur in pink and calyx sprays. Use on sulfur tolerant varieties only. Macintosh, Golden Delicious, Jonathan and certain other varieties may be injured by sulfur under certain climatic conditions.

ASPARAGUS: For control of **RUST-** Use 15 to 35 lbs. per acre. Apply after cutting stops, irrigate, cultivate, then apply the sulfur. Repeat at 7 to 10 day intervals through season. For rust control during Fern period, apply at 2 to 3 week intervals or with the regularly scheduled insect program. For suppression of **TWO-SPOTTED and BROWN MITES-** Apply 6-10 lbs. per acre. Apply when pest first appears and repeat as necessary.

BEANS AND PEAS: SPIDER MITE and POWDERY MILDEW - Apply 6 - 10 lbs. per acre. Sulfur may injure certain varieties of beans. Begin application when pest first appears. Repeat as necessary.

CARROTS, ONIONS AND GARLIC: PETROBIA MITE and POWDERY MILDEW -Apply 9 to 15 lbs. per acre. Apply when pests first appear and repeat at 14 day intervals or as needed.

CHERRIES: BLOSSOM BLIGHT, BROWN ROT, LEAF SPOT, POWDERY MILDEW-Apply 4 to 6 lbs. per 100 gallons of water as a dilute spray, or 15 to 20 lbs. per acre as an air or concentrate application. Begin in popcorn stage. Repeat at bloom, petal fall, and in cover sprays at 7 to 14 day intervals and as a post harvest foliar treatment for **LEAF SPOT.**

CORN, SMALL GRAINS (Barley, Oats, Rye, Wheat) SORGHUM and SOYBEANS: For suppression of the **TWO SPOTTED, GRASS BANKS and PACIFIC MITE,** for control of the **ATLANTIC MITE (Small Grain Only)** for control of **POWDERY MILDEW-**Apply 6 to 15 lbs per acre. Apply when disease first appears and repeat as necessary, or with the regularly scheduled insect program.

COTTON: SPIDER AND STRAWBERRY (Atlantic) MITES- Apply 2 to 10 lbs. per acre. Begin when infestation first occurs and repeat at 1 to 2 week intervals as necessary, or with regularly scheduled insecticide program.

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RECOMMENDATIONS FOR USE (cont.)

CITRUS: For suppression of **SIX-SPOTTED, CITRUS FLAT** and **YUMA SPIDER MITES**- Apply 4 to 30 lbs. in no less than 15 gallons of water per acre. Apply when pests first appear and repeat as needed. Do not apply within 21 days of an oil spray.

GRAPES: POWDERY MILDEW - Apply 2 lbs. per 100 gallons of water or 3 to 5 lbs. per acre. Apply when shoots are 6 inches long, repeat before blossoms open and continue as necessary. Concord and other labrusca type grapes may be injured by sulfur.

MELONS: Use 20 to 25 lbs. per acre to control Powdery Mildew. Powdery Mildew may be controlled by sulfur, but the sulfur often injures the vines, particularly if the temperature reaches 95 F. Treat when disease first appears. Repeat as necessary. **DO NOT USE ON SULFUR SENSITIVE VARIETIES.**

PEACHES and NECTARINES: BROWN ROT, CORYNEUM BLIGHT, RUST, PEACH SILVER MITE, POWDERY MILDEW - Apply 4 to 6 lbs. per 100 gallons of water, or 15 to 30 lbs. per acre as an air or concentrate application. Begin in pink bud stage on Nectarines. For **BROWN ROT** (Peaches only) control in summer sprays- Apply 6 lbs. per 100 gallon of water, or 15 to 20 lbs. per acre. Begin application about 4 to 5 weeks before harvest and continuing at weekly intervals.

PEANUTS: For control of **RUST**- Apply 3 to 12 lbs. per acre. Apply when pests first appear. Repeat as necessary.

PEARS: SCAB, POWDERY MILDEW - Apply 4 lbs. plus 1 gallon lime sulfur per 100 gallons, or 20 to 30 lbs. per acre. Apply in pink or pre-blossom spray. On Bartlett Pears, apply 4-6 lbs at petal fall through second cover sprays. Sensitive varieties (e.g. Anjou, Comice) under certain climatic conditions may be injured by sulfur.

PLUMS and PRUNES: BROWN ROT, BLOSSOM BLIGHT, PRUNE RUST- Apply 5 to 6 lbs. per 100 gallons as a dilute application or 20 to 25 lbs. per acre as an air or concentrate application. Apply when disease threatens during rain periods and repeat at 7 to 10 day intervals. Do not apply after jacket stage.

POTATOES: POWDERY MILDEW and TWO-SPOTTED SPIDER MITES- Apply 6 to 10 lbs. per acre. Apply when disease first appears. Repeat application at 3 to 4 week intervals or as necessary.

STRAWBERRIES, RASPBERRIES and BOYSENBERRIES: POWDERY MILDEW - Apply 2 to 5 lbs. per 100 gallons, or 4 to 10 lbs. per acre. Begin at first sign of disease and repeat as necessary. Discontinue applications during hot weather. Sulfur may injure strawberries under certain climatic conditions.

10 of 15

SUGAR BEETS: For control of **POWDERY MILDEW**- Apply 3 to 12 lbs. per acre. Apply when disease first appears. Use lower rates for light disease pressure or as a preventive treatment. Repeat applications at 3 to 4 week intervals or as necessary.

TOMATOES: For control of **TOMATO RUSSET MITE**- Use 15 to 30 lbs. per acre. Begin when infestation first occurs and repeat as necessary or with the regularly scheduled insect program.

ORNAMENTALS

ROSES: BLACK SPOT, POWDERY MILDEW, RUST - Apply 3 tablespoons per gallon (6 lbs. per 100 gallons) and spray for full coverage wetting both sides of leaves. Begin applications when new growth appears in the spring and repeat every 7 days, if necessary.

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 approval 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 a dry place.

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.

In Case of Emergency, Call **CHEMTREC 800/424-9300**

NET CONTENTS = 50 POUNDS

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**CHEMIGATION
Golden Dew
EPA Reg. No. 2935-407**

Supplemental Label

Apply this product only through sprinklers (center pivot, lateral move, end tow, side or wheel roll, traveler, big gun, solid set, or hand move) irrigation systems.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the Chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

CHEMIGATION SYSTEMS CONNECTED TO PUBLIC WATER SYSTEMS

1.) Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

2.) Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

3.) The pesticide injection pipeline must contain a functional, automatic quick-closing check valve to prevent the flow of fluid back toward the injection pump.

4.) The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to

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prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

5.) The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

6.) Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

7.) Do not apply when wind speed favors drift beyond the area intended for treatment.

8.) Apply at rate specified on the container label for individual crops. Do not allow mixture to stand. Keep agitator running during application. Apply at end of irrigation period. Do not operate irrigation system after application until deposit has thorough dried.

SPRINKLER CHEMIGATION

1.) The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.

2.) The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

3.) The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

4.) The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

5.) The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

6.) Systems must use a metering pump, such as a positive displacement injection pump (e.p., diaphragm pump) effectively

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designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

7.) Do not apply when wind speed favors drift beyond the area intended for treatment.

8.) Apply at rate specified on the container label for individual crops. Do not allow mixture to stand. Keep agitator running during application. Apply at end of irrigation period. Do not operate irrigation system after application until deposit has thoroughly dried.

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

*missing
language*