

PM 21

2935-485

1/3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 4, 1997

Ms. Joanne C. Striebich, Registration and Labeling Specialist
Wilbur-Ellis Company, Agricultural Services Corporate Office
191 West Shaw Avenue, Suite 107
Fresno, CA 93704-2876

RE: BT 320 Sulfur Dust (EPA File Symbol 2935-UIL)
Your label facsimile transmission dated January 30, 1997

Dear Ms. Striebich:

The Agency has reviewed the subject submission, and the label is accepted with comments.

Our comments are as follows: under precautionary statements, Hazards to Humans and Domestic Animals, delete the last two sentences; this information appears elsewhere on the label. Note that User Safety recommendations appear twice.

A photocopy of the subject submission stamped "Accepted with Comments" is enclosed for your records, and a copy is being included in the regulatory file jacket for the product.

If you have any questions or concerns, please call me at (703) 305-6226, or Carl Grable of my staff at (703) 305-7392.

Sincerely yours,

A handwritten signature in cursive script that reads "Connie B. Welch".

Connie B. Welch,
Product Manager 21
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosure

WILBUR-ELLIS

BT 320 SULFUR 50 DUST

(BACILLUS THURINGIENSIS)

ACCEPTED
 with COMMENTS
 to EPA Letter Dated
 6-4-97
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2935-1485

ACTIVE INGREDIENTS:

Bacillus thuringiensis subspecies thuringiensis	0.064%
Lepidopteran active toxins	50.00%
Sulfur	49.936%
INERT INGREDIENTS	100.00%

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-

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 humans or other persons, either directly or through drift. Only protected individuals may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

CAUTION

KEEP OUT OF THE REACH OF CHILDREN!

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Causes moderate eye irritation. Wash thoroughly with soap and water after handling.

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.

STATEMENT OF PRACTICAL TREATMENT

If on Skin - Wash with plenty of soap and water. Get medical attention.

In Eyes - Flush eyes with plenty of water. Call a physician if irritation persists.

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 HAZARDS

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

Directions for use continued:

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 50 Dust. After eating BT 320 Sulfur 50 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 50 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 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 50 Dust.

CROP	PEST	LBS. PER ACRE
Broccoli, Cabbage, Collards, Kale Mustardgreens	Cabbage looper	20 - 40
	Imported cabbageworm	20 - 35
Cauliflower	Cabbage looper	20 - 50
	Imported cabbageworm	20 - 40

Continued on page 2

USER SAFETY RECOMMENDATIONS

Users should:

A) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

B) Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

C) 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.

3/3

BY 320 SULFUR 50 DUST, Page 2 of 2

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

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.

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.

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 FOLDER 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.

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

NET CONTENTS = 50 POUNDS

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