

JUN 21 2002

Ms. Emily Smathers Ratliff  
Helena Chemical Company  
225 Schilling Boulevard, Suite 300  
Collierville, Tennessee 38017

Dear Ms. Ratliff:

Subject: Dusting Sulfur  
EPA Reg. No. 5905-288  
Your Submission of May 2, 2002

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that the following labeling changes are made prior to release of the product for shipment.

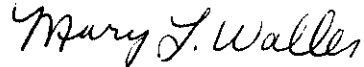
1. In the revised First Aid section, change the heading from "If on skin" to "If on skin or clothing". Correct the second sentence under this heading to read "Rinse skin immediately with plenty of water for 15-20 minutes."
2. There has been a recent change in the Worker Protection Standard (WPS) labeling regarding the use of the term "waterproof gloves". Under Personal Protective Equipment, add "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." Change "waterproof gloves" to "chemical-resistant gloves made of any waterproof material" in the PPE statement and in the Agricultural Use Requirements box.
3. Under Environmental Hazards, change the first sentence by deleting "For terrestrial uses,". This phrase is only used for labels containing both terrestrial and aquatic uses.

Submit one copy of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed.

Sincerely yours,



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

Enclosure

7505C:CGrable:cg:6/20/02

# DUSTING SULPHUR

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<b>ACTIVE INGREDIENT:</b>		<b>BY WT.</b>
Sulphur .....		93%
<b>INERT INGREDIENTS:</b> .....		7%
<b>TOTAL:</b> .....		100%

Screen Test, Sulphur, through 325 mesh - 93%

## KEEP OUT OF REACH OF CHILDREN CAUTION

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

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

#### FIRST AID

<b>IF ON SKIN:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water, after the first minutes, then continue rinsing.</li><li>• Call a poison control center or doctor immediately for treatment advice.</li></ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"><li>• Hold eyelid open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor immediately for treatment advice.</li></ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Have a person sip a glass of water if able to swallow.</li><li>• Do not give anything to an unconscious or convulsing person.</li></ul>

#### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call ChemTrec at 1-800-424-9300.

#### SEE OTHER CAUTION STATEMENTS ON SIDE PANEL

EPA REG. NO. 5905-288  
EPA EST. NO.

NET CONTENTS:

**MANUFACTURED BY  
HELENA CHEMICAL COMPANY  
225 SCHILLING BOULEVARD, SUITE 300  
COLLIERVILLE, TENNESSEE 38017**

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
JUN 21 2002**

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

5905-288

## PERSONAL PROTECTIVE EQUIPMENT

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### Applicators and other handlers must wear:

- Long-Sleeved shirt and long pants
- Waterproof gloves
- 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.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

## USER SAFETY RECOMMENDATIONS

Users 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.

## ENVIRONMENTAL HAZARDS

For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

## PHYSICAL OR CHEMICAL HAZARDS

Keep away from heat, sparks, or flame. Do not smoke while applying this product.

## 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.

## 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:

- Coveralls
- Waterproof gloves
- Shoes plus socks

## STORAGE AND DISPOSAL

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 by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of bags in a sanitary landfill or by incineration if allowed by State and local authorities.

## PRODUCT INFORMATION

To be used as a dust without dilution in conventional ground or air equipment. The best hours for dusting are usually between 5:00 p.m. and 9:00 a.m. and when the wind velocity is less than 5 miles per hour. For disease control begin applications before diseases occur or appear and repeat at 7 to 10 day intervals as needed. To assure good control of mites, dust lower leaf surfaces.

Some fruits and other plants are susceptible to injury from sulphur under certain climatic conditions. The user is advised not to use sulphur on any crop unless local use has proved that sulphur does not damage crops in that locality. Sulphur may burn foliage when the temperature is high (90° or above). Do not use sulphur on Eastern American type grapes, spinach, apricots, or other sulphur susceptible plants. Do not make applications

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within two weeks before or after an oil spray. On citrus do not apply within 60 days prior to or after an oil spray. For light to moderate infestations use lower amount recommended. For moderate to heavy infestations use higher of recommended amounts.

When growing crops for processing, consult processor before applying sulphur.

#### RECOMMENDATIONS

##### APPLES, CHERRIES, PEACHES, NECTARINES, PLUMS, QUINCES:

**Powdery Mildew, Brown Rot, Scab** - 40 to 60 lbs. per acre. Dust when disease first appears and repeat as necessary. For cherries make first application of Pink Bud Stage, retreat at petal fall and shuck fall stages. Peaches and plums use as a preventative dusting when the fruit starts to ripen. Apply when plants are dry. Sulphur may cause russetting of some apple varieties.

##### BEANS:

**Powdery Mildew, Rust, Leaf Spot** - 15 to 20 lbs. per acre. Sulphur may injure some varieties.

##### BLUEBERRIES, BLACKBERRIES, BOYSENBERRIES, DEWBERRIES, LOGANBERRIES, CURRANTS, GOOSEBERRIES, HUCKLEBERRIES, RASPBERRIES:

**Powdery Mildew** - Use 10 to 20 lbs. per acre.

##### CITRUS:

**Citrus Red Spider, Two-spotted Mite, Thrips** - Use 80 to 95 lbs. per acre. Dust when infestation threatens.

##### COTTON:

**Atlantic Mite** - Apply 25 to 30 lbs. per acre by ground or 30 to 35 lbs. per acre by air. Most effective when temperatures are 90°F or above. Dust when infestation threatens.

##### CUCUMBER, MELONS, PUMPKIN, SQUASH:

**Powdery Mildew** - Use 10 to 20 lbs. per acre. Do not use on cucurbits unless local experience has proven sulphur to be safe on such plants.

##### GRAPES:

**Powdery Mildew** - Use 20 to 40 lbs. per acre. Dust first when shoots are 6 inches long. Follow a dusting program of application each 7 to 10 days.

##### ONIONS:

**Downy Mildew** - Use 15 to 30 lbs. per acre.

##### PEANUTS:

**Leaf Spots** - Make 3 to 4 applications starting last week in June and not later than July 10. Following applications at 14 day intervals. Make applications as follows - 1st application, 15 lbs. per acre. 2nd application - 18 lbs. per acre. 3rd application - 20 lbs. per acre. 4th application (if needed) - 20 lbs. per acre.

##### STRAWBERRIES:

**Powdery Mildew** - Use 10 to 20 lbs. per acre.

##### SUGAR BEETS:

**Spider Mites** - Use 30 to 35 lbs. per acre. Use in hot weather in desert areas. May cause burn but injury less severe following irrigation. Dust as infestation warrants.

##### TOMATOES:

**Tomato Russet Mites** - Use 30 to 40 lbs. per acre. Apply in early season.

#### CONDITIONS OF SALE - LIMITED WARRANTY AND LIMITATIONS OF LIABILITY AND REMEDIES

Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow the label directions or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. The Company makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

The exclusive remedy against the Company for any cause of action relating to the handling or use of this product shall be limited to, at Helena Chemical Company's election, one of the following: 6/6

1. Refund of the purchase price paid by buyer or user for product bought, or
2. Replacement of the product used

To the extent allowed by law, the Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income. The Company and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.

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