

5905-289

09/19/2002

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



OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

SEP 19 2002

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

Subject: Wettable Sulfur  
EPA Reg. No.: 5905-289  
Submission dated May 2, 2002

Dear Ms. Ratliff:

The revised product labeling referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you make the following changes before you release the product for shipment with the amended labeling:

1. Revise the statements on page 2 in "Personal Protective Equipment" and "Agricultural Use Requirements" sections: "Waterproof gloves" to "Chemical resistant gloves made of a waterproof material (such as Nitrile, Neoprene, and/or Barrier laminate)"
2. Move the heading "Precautionary Statements" and all precautionary language so that it is below the first aid statements and precedes the PPE section of the label on the next page.
3. Revise the statement "See Other Cautions Below" to "See Other Precautionary Statements Below". Pesticide product "SIGNAL words" (i.e.: DANGER, WARNING, CAUTION) are not to be used on pesticide products in any other context other than as "SIGNAL words".
4. The registrant should remove or revise the "ChemTrec" number in the First Aid" section of the label. It is our understanding that this number is only for spills, fires, leaks and transportation related emergencies. It is our understanding that "ChemTrec" will not provide assistance in pesticide product first aid for end-use products that are not a transportation incident. If this is not correct, please provide us evidence that "ChemTrec" will respond in a "First Aid" emergency for this product.

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5. Add "PPE" after Personal Protective Equipment because that acronym is used in the label directions.
  6. Revise "handers" to "handlers" on the second page of the label.
  7. The Heading "Recommendations" must be revised to "Application Rates". The word recommendation is not an enforceable term.

The Agency notes that this proposed label does not include any labeling to prevent spray drift. The Agency requests that you review the draft Pesticide Regulation Notice (enclosed) and include appropriate spray drift instructions/guidance in a revised label.

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed label before you release the product for shipment. If you have questions about this label review, please contact Dennis McNeilly at (703) 308-6742 or electronically at [mcneilly.dennis@epa.gov](mailto:mcneilly.dennis@epa.gov).

Sincerely,



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

Enclosure: stamped label

# WETTABLE SULPHUR

For Use in Water As An Agricultural Fungicide

<b>ACTIVE INGREDIENT:</b>		<b>BY WT.</b>
Sulphur .....		90%
<b>INERT INGREDIENTS:</b> .....		10%
<b>TOTAL:</b> .....		100%

<p><b>KEEP OUT OF REACH OF CHILDREN</b></p> <p><b>CAUTION</b></p> <p><b>PRECAUTIONARY STATEMENTS</b></p> <p><b>HAZARDS TO HUMANS AND DOMESTIC ANIMALS</b></p> <p><b>CAUTION</b></p> <p>Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap after handling.</p>	<p><b>ACCEPTED</b> with <b>COMMENTS</b> In EPA Letter Dated</p> <p>SEP 19 2002</p> <p>Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. <u>5905-289</u></p>
<b>FIRST AID</b>	
<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>
<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>HOT LINE NUMBER</b>	
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.	
<b>SEE OTHER CAUTIONS BELOW.</b>	

EPA REG. NO.: 5905-289  
EPA EST. NO. 51036-GA-1

NET CONTENTS:

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

**PERSONAL PROTECTIVE EQUIPMENT**

- 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**

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 rinsate or equipment washwater.

**CHEMIGATION PROHIBITION**

Do not apply this product through any type or irrigation system

**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 exposed 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.

**PRODUCT INFORMATION**

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 make sulphur applications on Eastern American type grapes, spinach, apricots, or other sulphur susceptible plants. Do not make applications within two weeks before or after an oil spray.

For light to moderate infestations use lower amount recommended. For moderate to heavy infestations use higher of recommended amounts. Use enough water to insure adequate coverage.

WHEN GROWING CROPS FOR PROCESSING, CONSULT PROCESSOR BEFORE APPLYING SULPHUR.

DO NOT USE WITHIN FOUR (4) WEEKS OF AN OIL SPRAYING.

**RECOMMENDATIONS**

Pour needed amount into tank under agitation. If necessary, add a few drops of oil to avoid foaming.

**DIRECTIONS FOR DILUTION:**

**DILUTE APPLICATION:** Ground application - Apply specified rate in 20 to 100 gallons of water per acre. Orchard Application - Apply specified rate in 100 to 1500 gallons of water per acre.

**CONCENTRATE APPLICATION:** Ground Application - Apply specified rate in not less than 5 gallons of water per acre. Orchard Application - Apply specified rate in 20 to 100 gallons of water per acre. Special concentrate equipment is necessary for these areas.

**AIR APPLICATION:** Apply specified rate in 5 to 20 gallons of water per acre. Orchard rates should not be applied in less than 10 gallons of water per acre. FOR BEST RESULTS use sufficient water per acre to give thorough coverage of all plant parts.

**ALMONDS, CHERRIES, PLUMS, PRUNES:**

**Brown Rot, Leaf Spot, Powdery Mildew, Silver Mite, Red Spider Mite** - Apply 10 to 30 lbs. per acre. Apply at bloom or early petal fall and repeat at 10 -14 day intervals as necessary or after period of wet weather.

**APPLES, PEARS (Except D'Anjou):**

**Powdery Mildew, Scab, Red Spider Mite** - Apply 10 - 30 lbs. per acre at pre bloom and petal fall and apply with cover sprays throughout the season.

**PEACHES, NECTARINE:**

**Brown Rot Blossom Blight, Powdery Mildew, Silver Mite, Red Spider Mite** - Apply 10 to 30 lbs. per acre at bloom or early petal fall and repeat at 10 -14 day intervals as necessary or after period of wet weather.

**CITRUS (GRAPEFRUITS, KUMQUATS, LEMONS, LIMES, ORANGES, TANGERINES, TANGELOS):**

**Flat Mite, Red Spider Mite** - Apply 8 to 20 lbs. per acre. Apply in any spray NOT CONTAINING OIL or following oil by 14 days. Apply when infestation threatens.

**WALNUTS:**

**European Red Mite, Almond Mite, Two-Spotted Mite, Red Spider Mite** - Apply 10 to 20 lbs. per acre. Apply with mite sprays to increase effectiveness. CAUTION: Do not apply unless variety is known to be tolerant to sulphur.

**GRAPES:**

**Powdery Mildew, Red Spider Mite** - Apply 5 lbs. per acre. Apply in late dormancy, with cutworm spray, early shoot period and every 14 days through season.

**BLACKBERRY (Rubus spp.):**

**Powdery Mildew** - Apply 6 to 15 lbs. per acre. Apply when new shoots are 6" long and before blossoms open. Repeat at 10 day intervals as necessary.

**RASPBERRY (Rubus spp.):**

**Powdery Mildew (Sphaerotheca humuli)** - Apply 6 to 15 lbs. per acre. Apply each week starting at first bloom color, until fruit is set, then repeat as weather requires.

**STRAWBERRIES:**

**Powdery Mildew, Red Spider Mite** - Apply 5 to 10 lbs. per acre. Apply at early leaf stage. For powdery mildew, at first signs of disease and repeat as needed.

**BEANS, PEAS, BROCCOLI, BRUSSEL SPROUTS, CABBAGE, CAULIFLOWER, COLLARD, KALE, PEPPERS, POTATOES:**

**Powdery Mildew, Red Spider Mite** - Apply 5 lbs. per acre. Apply at early leaf stage and repeat every 10 to 14 days.

**TOMATOES:**

**Russet Mite** - Apply 5 lbs. per acre as needed. Thorough coverage required.

**COTTON, SEED ALFALFA:**

**Red Spider Mite** - Apply 5 lbs. per acre as needed.

**PEANUTS:**

**Powdery Mildew, Leaf Spot, Red Spider Mite** - Apply 8 lbs. per acre. Start at early leaf stage and repeat as necessary, usually 10 - 24 days.

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**SUGAR BEETS:**

**Red Spider Mite** - Apply 5 lbs. per acre as needed.

**ROSES:**

**Black Spot, Powdery Mildew** - Apply 6 to 8 lbs. per 100 gallons of water. Apply at first sign of disease and repeat as needed.

**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:

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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SULPHUR, SOLID, ORM-C, UN 1350