

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

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

Ms. Linda C. Watson Consultant for Britz Fertilizer's Inc. Pesticide Regulatory Services 3703 Sedgefield Drive Valdosta, GA 31602

JAN 9 1992

Dear Ms. Watson:

Subject: Britz MAGIC SULFUR DUST

EPA Reg. No. 1095<u>0</u>-9

Application for Pesticide Amendment of 09/09/91

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is acceptable provided you:

- Submit/cite all data or other material required for registration/ reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- 2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Following ENVIRONMENTAL HAZARDS, change the second sentence to "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."
 - b. Following the REENTRY STATEMENT, change the 24-hour reentry information to ""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 then 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." Also add "Pesticide Handlers: During mixing, loading and application of this product, wear long pants (or coveralls), long sleeves shirt, shoes, socks, chemical/water resistant gloves and goggles or face shield."

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- c. Since paper and/or plastic bags are used as containers, the appropriate CONTAINER DISPOSAL statement is "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."
- d. Since the NOTE under USE PRECAUTIONS which says do not apply to cucurbits and ornamental is followed by directions for use on cucumbers, squash, melons and ornamental, the statement would be clearer with the addition of "except as directed on this label." Phytoxicity is of consideration with sulfur.
- e. Also, regarding possible phytotoxicity or presence of sulfur dust on loked dates, the rate of 125 lbs/acre is notably twice the application rate for any other crop from any of the 13 labels referred to. Furthermore, dates are not on any of the other labels referenced including your current label. This is brought to your attention to reconsider this use and rate.
- f. Under grapes, the last sentence referring to nectarines and peaches as labrusca grape types needs clarification.
- 3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

Francisco Commence

Susan T. Lewis Product Manager (21) Fungicide-Herbicide Branch Registration Division (H7505C)

Enclosure

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PROPOSED PRODUCT LABELING

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION! Harmful if swallowed, inhaled or absorbed through skin. May cause irritation of nose, throat, skin, eyes or clothing. Wash thoroughly with scap and water after handling. Remove contaminated clothing and wash before reuse. Do not contaminate feed or foodstuffs.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not apply directly to water or wetlands. Do not apply where runoff conditions are likely to occur. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment wash waters.

PHYSICAL AND CHEMICAL HAZARDS: Sultur dust suspended in air ignites easily. Keep away from heat, sperks and flame. Do not smoke while applying this product. SULFUR IS HIGHLY CORROSIVE AND EQUIPMENT SHOULD BE CLEANED THOROUGHLY.

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 enter treated area without protective clothing and respiratory protection for 24 hours following application.

Do not apply this product in such a manner as to directly, or through drift, ose workers or other persons. The area being treated must be vacated by otected persons.

...tien or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. 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. Written warnings must include the following information: "CAUTION! Area treated with SULFUR DUST on: (Date of Application). Do not enter without appropriate clothing for 24 hours following application. In case of accidental exposure, see the Statement for Practical Treatment on this label."

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store unused product in original container only in cool, dry area out of reach of children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

TAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recy-, reconditioning, or dispose of in a sanitary landfill, or by incineration if amoved by state and local authorities.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JAN 09 1992

Under the Federal Insertant.

Fundade, and Robentiside Act.

amended, for the postacide registered under EFA Rog. No.

1095/-9

Britz MAGIC SULFUR DUST

Active Ingredient: SULFUR

Inert Ingredients:

98% 2% 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

- See additional Precautionary Statements on side penel -

STATEMENT OF PRACTICAL TREATMENT

<u>IF SWALLOWED</u>: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention.

<u>IF ON SKIN</u>: Wash thoroughly with soap and water. Get medical attention.

<u>IF IN EYES</u>: Wash eyes with plenty of clear water for at least 15 minutes.

EPA Reg. No. 10951-9

EPA Reg. No. 10951-CA-5

S-2/91

Net Weight 50 pounds

Manufactured for

Britz Fertilizers, Inc.

P.O. Box 366, Five Points, CA 93624-2421 (209) 884-2421

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DIRECTIONS FOR USE - Continued

PRODUCT INFORMATION

BRITZ MAGIC SULFUR DUST may be applied by ground or serial application. For disease control at the recommended rates, it is necessary to apply so as to uniformly cover both the upper and lower leaf surfaces. Consult your State Agricultural Experiment Station or Extension Specialist for advice in selecting treatments from this label best for local conditions.

USE PRECAUTIONS

EXCEPT ON COTTON, do not apply when temperatures exceed or are likely to exceed 90°F. When growing crops for processing, consult processor before applying sulfur. Do not use sulfur with oil or within or 14 days of an oil spray (for citrus, 21 days). Do not combine with emulsifiable liquids.

NOTE: Sulfur will cause severe fruit and leaf injury to sulfur sensitive crops. Do not apply or allow to drift to Apricots, d'Anjou and Comice pears, Cranberries, Cucurbits (cucumbers, cantaloupes, melons and squesh), Filberts, Spinach, Turf and Ornamental trees (e.g. Tung), Walnuts or other sensitive plants. Sulfur may burn foliage and fruit during periods of high temperatures and under certain climate conditions.

DIRECTIONS

BRITZ MAGIC SULFUR DUST is prepared for use against certain pasts and diseases of crops as fisted below. Do not apply if temperatures during or within 3 days after application are expected to exceed 90°F in the area to be treated. Use the high rates and shorter repeat application in **revals when high disease pressure conditions or high mite population levels exist. Unless otherwise specified, (a) disease control applica-

tould begin when conditions exist which are conducive to disease development peat application should be made at 10 to 14 day intervals while weather mons continue to favor disease development, and (b) mite control applications should be made whenever a significant population level exists.

ALFALFA: Powdery mildew, apply 15 to 25 lbs per acre at first sign of powdery mildew and repeat at 14 day intervals or as necessary. Atlantic mite, Clover mite, Two-spotted spider mite, Pacific spicer mite and Strawberry spider mite., apply 15 to 50 lbs per acre when mites first appear and repeat as necessary. May cause flower burn.

ALMONDS, CHERRIES, NECTARINES, PEACHES, PLUMS AND PRUNES: Cherry leaf spot (cherries only), Rust and Powdery mildew (nectarines and peaches only), apply 40 to 50 lbs per acre at pre-bloom, bloom and post-bloom periods. Apply when disease threatens during rain periods and repeat at 7 to 10

atervals. Brown rot of fruit (except almond), apply 40 to 50 ar acre 4 weeks prior to harvest and again 2 weeks later or every 7 days if wet weather prevails during the period prior to harvest. Peach silver mite (almond, nectarines and peaches only), apply 25 to 50 lbs per acre after thinning.

APPLE and PEAR: Scab, 40 to 50 ibs per acre at green tip and again at pink bud. Pink bud treatments also control Powdery mildew. Do not apply during or shortly before frost conditions and/oruse of captan. Do not apply to pears after the fruit begins to turn down. Some varieties of apples and pears may be injured by sulfur; check variety tolerance prior to application.

ASPARAGUS: Rust, apply 10 to 35 lbs per acre. Dust after cutting stops, irrigate, cultivate, and then apply sulfur. Repeat at 7 to 10 day intervals through season.

BEANS: Powdery mildew, Rust, Two-spotted spider mite, Pacific spider mite and Strawberry spider mite, apply 15 to 30 lbs per acre. For rust control, start applications as soon as the first true leaves form and continue at weekly intervals until blossom time. May cause injury to some varieties. Check tolerance prior to application. Do not apply to varieties susceptible to sulfur injury.

CARROT: Petrobia mite, apply 30 to 40 lbs per acre.

CITRUS: Six-spotted mite, Citrus rust mite, apply 80 lbs per acre from November to June. Citrus flat mite, apply 100 lbs per acre from October to March 15. Citrus thrips, apply 100 lbs per acre at mid-March, petal fall, and again 2 to 4 weeks later. Do not apply within 60 days of oil sprays.

COTTON: Atlantic mite, Strawberry spider mite, apply 45 to 50 lbs per acre when mites first appear and repeat as necessary.

CUCUMBER, SQUASH: Powdery mildew, apply 15-20 lbs per acre. Do not apply at high temperatures or to varieties susceptible to sulfur injury. Repeat applications in 7 to 10 days if necessary.

DATES: Banks grass mite, apply 50 to 125 lbs per acre, applied by ground or air. Apply higher rates by air. Thorough coverage is needed for good control.

FIG: Fig rust mite, apply 40 lbs per acre in the spring and again in the early summer.

GRAPE: Powdery mildew, apply 8 to 20 lbs per acre. Begin applications when shoots are 6 to 8 inches long and repeat when shoots are 12 to 15 inches long. Repeat every 10 to 14 days until harvest. Do not apply if temperatures during or shortly after treatment are expected to exceed 100°F. When applying sulfur to grapes, do not allow workers to enter the field within 1 day (24 hours) of application. Labrusca type grapes may be injured (nectanines and peaches only), by sulfur.

MELONS: Powdery mildew, apply 20-25 lbs per acre. Spider mites, apply 30-50 lbs per acre. Do not apply to varieties susceptible to sulfur injury. Sulfur often injures vines at temperatures above 90°F.

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ONION, GARLIC: Petrobia mite and Powdery mildew, apply 10 to 40 lbs per acre. Apply at first sign of disease or mites and repeat at 14 day intervals or as necessary.

ORNAMENTALS: Powdery mildew, apply 20 to 40 lbs per acre to alder, azalea, bittersweet, boston ivy, buttonbush, catalpa, chrysanthemums, dahlia, delphinium, dogwood, honeysuckle, horse chestnut, hydrangea, lilac, linden, magnolia, matrimony vine, phlox, rhododendron, rose, staghorn, sumac, sweet pea, sycamore, trumpet vine, witch hazel and zinnia; Rust, apply 20 to 40 lbs per acre on of aster, carnation, rose and snapdragon, and repeat as necessary. Check variety tolerance before application.

OLIVES: *Mites*, apply 50 to 70 ibs per acre. Damage may occur to crop and foliage if applied during or before high temperatures.

PISTACHIO: Citrus flat mite, apply 50 lbs per acre by air or ground. Apply when mites first appear and repeat as necessary.

POMEGRANATES: *Mites*, apply 50 lbs per acre. Apply at first sign of mites and repeat as necessary to maintain control.

STRAWBERRIES, BOYSENBERRIES, RASPBERRIES, BLACKBERRIES, GOOSEBERRIES and LOGANBERRIES: Powdery mildew, apply 10 to 25 lbs per acre. Apply at first sign of disease and repeat as necessary. Sulfur may cause some injury under certain climatic conditions.

SUGAR BEET: Powdery mildew, Two-spotted spider mite, Pacific spider mite and Strawberry spider mite, apply 35 to 50 lbs per acre. Apply at first sign of disease or mites and repeat at 14 day intervals or as necessary.

TOMATO: Tomato russet mite, Powdery mildew, apply 15 to 40 lbs per acre. If the crop is being grown with the aid of stakes or poles, apply 10 to 13 lbs per acre per foot of average plant height.

WHEAT: Powdery mildew, apply 35 to 50 lbs per acre. Apply at first sign of disease and repeat every 14 days or as necessary.

CONDITIONS OF SALE: (1.) Britz Fertilizers, Inc. (Britz) werrants that this material conforms to the chemical description on the label and is reasonably fit for use as directed hereon. Britz neither makes, nor authorizes any agent or representative to make, any other warranty of FITNESS or of MERCHANTABILITY, guarantee or representation, express or implied, concerning the material.

(2.) Critical and unforeseable factors beyond Britz's control prevent it from eliminating all risks in connection with the use of chemicals. Such risks include, but are not limited to, damage to plants and crops to which the material is applied, lack of complete control, and damage caused by drift to other plants and crops. Such risks occur even though the product is reasonably fit for the uses stated hereon and even though label directions are followed. Buyer and user acknowledge and assume all risks and fieldilly (except those assumed by Britz under 1, above) resulting from handling, storage, and the use of this material.