

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 21

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Mr. Carol D. Campbell  
Drexel Chemical Company  
2487 Pennsylvania Street  
P.O. Box 9306  
Memphis, TN 38109

Dear Mr. Campbell:

Subject: Amended Labeling - All Groups  
Drexel Sufsa  
EPA Registration No. 19713-39  
Your Submission Dated April 26, 1989

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 that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling change listed below before you release the product for shipment bearing the amended labeling:
  - Revise the dosage rate for onions and garlic to 3/4 to 1 1/2 gallons per acre.
3. Submit one (1) copy of your final printed labeling before you release the product for shipment.

**BEST AVAILABLE COPY**

55901:I:CR-43:Stone:LR-12:KENCO:7/17/89;7/27/89:rw:vo:de:rw

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

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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 constitutes acceptance of these conditions.

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

Sincerely yours,



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

Enclosure

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**SUFFA**

**A FLOWABLE 6 POUND ELEMENTAL SULFUR**

**ACTIVE INGREDIENTS:**

Elemental Sulfur . . . . . 52%

**INERT INGREDIENTS:** . . . . . 48%

**TOTAL.** . . . . . 100%

Product contains 6.0 lbs. of Sulfur per gallon.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

EPA REG. NO. 19713-39  
EPA EST. NO. 19713-TN-1

MANUFACTURED BY:  
DREXEL CHEMICAL COMPANY  
PO BOX 9306 \* MEMPHIS, TN 38109

**NET CONTENTS: 5 GALLONS/18.9 LITERS**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

JUL 21 1989

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

14713-39

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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Causes eye and skin irritation. Harmful if swallowed, avoid breathing of spray mist. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating or smoking. May cause irritation of nose, throat and skin. Avoid contact with eyes, skin and clothing. Remove and wash contaminated clothing before reuse. 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.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Call a physician or Poison Control Center. 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.

**IF SPLASHED IN EYES:** Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation develops.

**IF SPILLED ON SKIN:** Immediately remove contaminated clothing, INCLUDING SHOES, and wash skin with soap and plenty of water. If irritation develops, send for a physician.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of waste.

Do not contaminate water when disposing of equipment washwaters.

**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 through any type of irrigation system.

**REENTRY AND FARM WORKER SAFETY STATEMENT**

Do not enter treated areas until sprays have dried unless protective clothing is worn.

Because certain states may require more restrictive reentry 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 a treated area or in an area about to be treated with this product. Oral warnings must inform workers of areas or fields that may not be entered without specific protective clothing until sprays have dried, and

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appropriate actions to take in case of accidental exposure, as described under Precautionary Statements on this label. 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 Suffa on (date of application). Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure, flush eyes or skin with plenty of water. Call a physician if irritation persists. Remove and wash contaminated clothing before reuse.

IMPORTANT: Some fruits and other plants are susceptible to injury from sulfur under certain climatic conditions. The user is advised not to use sulfur on any crop unless local use has proven that sulfur is safe in that locality.

During periods of high temperatures sulfur may burn foliage and fruit. Do not make sulfur applications at excessively high temperatures. Do not use DREXEL SUFFA with oil or within four (4) weeks of an oil application, unless otherwise noted under specific crop directions for use. When DREXEL SUFFA is used with arsenicals, lime should be added to prevent plant injury.

Use of this material in a manner other than in accordance with this label may cause serious plant, crop or other personal injury, excessive residues, unsatisfactory control or other unintended consequences.

Consult your State Agricultural Experiment Station or State Extension Service Specialist for complete details on the spraying program best suited to your local conditions.

Unless otherwise specified for specific tree fruits, dosage rates are given as pints of DREXEL SUFFA per 100 gallons of water for use in a full coverage spray. When dosage rates are given in ranges, use the proper rate depending on severity of infection or infestation. Shake well before using.

Pour recommended amount into partially filled spray tank. Keep agitator running during filling and spraying operation. Do not allow mixture to stand. Failure to maintain agitation will cause Suffa to settle and may necessitate manual stirring to redisperse.

#### FRUIT AND NUT CROPS

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ALMONDS: Brown Rot, Powdery Mildew, Leaf Spot, Scab - 1 1/2 to 3 1/2 pints per 100 gallons of water. - Apply pre-bloom, petal fall and as a cover spray every 10-14 days or after a period of wet weather. Mites-Brown, Almond, European Red, Two-Spotted, Pacific, Strawberry (Atlantic) Silver, Flat - 1 1/2 to 3 1/2 pints per 100 gallons as needed when infestation is noted. Do not apply within two (2) weeks of an oil application.

**APPLES:** Scab, Powdery Mildew - 1 1/2 to 3 1/2 pints per 100 gallons of water - Apply pre-bloom, bloom, petal fall, shuck and as a cover spray throughout the season. Mites - Blister, European Red, and Two Spotted - 1 1/2 to 3 1/2 pints per 100 gallons as needed when infestation is noted.

**CANE FRUITS - BLACKBERRIES, BOYSENBERRIES, GOOSEBERRIES, LOGANBERRIES, RASPBERRIES:** Powdery Mildew - Apply 1 to 4 pts. per 100 gallons of water or 1 to 2 1/4 gallons (8 to 18 pts) per acre when new shoots are 6 inches long and before blossoms open. Repeat at 10 day intervals as necessary.

**CHERRIES:** Blossom Blight, Brown Rot, Powdery Mildew, Leaf Spot, Rust - 1 1/2 to 3 1/2 pints per 100 gallons of water - Apply pre-bloom, bloom, petal fall and as a cover spray at 7 to 14-day intervals and as a post-harvest foliar treatment for leaf spot. Mites - Silver and Flat - 1 1/2 to 3 1/2 pints per 100 gallons as needed.

**CITRUS:** Scale Crawlers, Mites-Rust, Six-Spotted, Citrus, Flat, Yuma, Silver - 1 to 4 pints per 100 gallons of water or in any spray NOT CONTAINING OIL or following oil for 3 weeks. Apply when pests first appear. Repeat application as necessary.

**GRAPES:** Powdery Mildew, Bud Mites, Blister Mites, Red Spider - 1 to 2 pints per 100 gallons of water or 2 to 6 pints per acre, preferably by ground equipment, beginning when shoots are 6-8 inches long and continuing at 7-10 day intervals. Concord and other Labrusa type grapes may be injured by sulfur.

**PEACHES AND NECTARINES:** Brown Rot, Coryneum Blight, Rust, Powdery Mildew, Scab - 1 1/2 to 3 1/2 pints per 100 gallons of water pre-bloom, bloom, petal-fall and in cover sprays at 7-14 day intervals. Peach Silver Mites - 1 1/2 to 3 1/2 pints per 100 gallons of water as needed when infestations appear.

**PEARS:** Scab, Powdery Mildew - 1 1/2 to 3 1/2 pints per 100 gallon of water - pre-bloom, petal fall, shuck and as a cover spray throughout the season. Mites - Blister, European Red, Two-Spotted - 1 1/2 to 3 1/2 pints per 100 gallons of water as needed. Sensitive varieties such as D'Anjou and Comice may be injured by sulfur under certain climatic conditions.

**PLUMS AND PRUNES:** Brown Rot, Scab, Powdery Mildew, Rust, Leaf Spot - 1 1/2 to 3 1/2 pints per 100 gallons of water pre-bloom, petal fall and as a cover spray at 7-10 day intervals. Silver Mites - 1 1/2 to 3 1/2 pints per 100 gallons of water as needed.

**STRAWBERRIES:** Powdery Mildew - 1 pint per 100 gallons of water or 6 pints per acre. Apply at first sign of infection and repeat at 3-week intervals. For strawberries that will be canned, discontinue application of sulfur well before harvest in accordance with local canners' recommendations. Sulfur may injure strawberries under certain climatic conditions.

**WALNUTS:** Mites - European Red, Pacific, Almond, Two Spotted - 2 to 5 pints per 100 gallons of water. Apply with miticide sprays to increase effectiveness. Certain varieties of walnuts are sensitive to sulfur. Do not apply unless the variety is known to be sulfur tolerant.

## VEGETABLE CROPS

**ASPARAGUS:** Rust - Apply 1 1/2 to 3 gallons (12 to 14 pints) per acre in sufficient water for thorough coverage after cutting stops, and at 7 - 10 day intervals through the season, during the fern period, apply at 2 - 3 week intervals or with a regular insect program. For Two-Spotted and Brown Mites use 5 to 7.5 pints per acre as necessary.

**BEANS AND PEAS:** Powdery Mildew, Rust, and Leaf Spot - 3 1/2 to 7 pints per acre in sufficient water for thorough coverage at first sign of infection and every 7 to 14 days as necessary. Mites - Two Spotted, Pacific, Strawberry (Atlantic) - 3 1/2 to 7 pints per acre in sufficient water for thorough coverage as necessary.

**CARROTS:** Powdery Mildew - 6 to 12 pints per acre in sufficient water for thorough coverage. Begin at first sign of disease and repeat at 7 - 10 day intervals.

**COLE CROPS:** BROCCOLI, BRUSSELS SPOUTS, CABBAGE, CAULIFLOWER, COLLARDS, KALE- Powdery Mildew - 3 to 6 pints per acre in sufficient water for thorough coverage beginning in early leaf stage and repeating every 10 to 14 days as needed, or immediately after rain. Mites - Two Spotted, Pacific, Strawberry (Atlantic) - 3 to 6 pints per acre in sufficient water for thorough coverage as necessary.

**MELONS:** Powdery Mildew - 2 1/4 to 3 gallons per acre in sufficient water for thorough coverage. Begin when first true leaves appear and repeat at weekly intervals. Some varieties are sensitive to sulfur, especially at high temperatures.

**ONIONS AND GARLIC:** Powdery Mildew - 3 1/4 to 1 1/2 gallons per acre in sufficient water for thorough coverage. Begin before disease is expected to appear and repeat as necessary.

**PEPPERS:** Powdery Mildew - 4 to 6 pints per acre in sufficient water for thorough coverage beginning in the early leaf stage and repeating every 10 - 14 days as necessary.

**POTATOES:** Powdery Mildew - 3 to 4 pints per acre in sufficient water for thorough coverage. Apply when disease first appears and repeat at 3 to 4-week intervals. Two-Spotted Mites - 4 pints per acre in sufficient water for thorough coverage as necessary.

**TOMATOES:** Tomato Russet Mite - 2 1/2 to 8 pints per acre in sufficient water to assure thorough coverage. Begin when infestation first occurs and repeat as necessary, or with the regularly scheduled insect program.

## FIELD CROPS

**ALFALFA:** Lygus Mites, Pacific Mites, Strawberry Mites - 4 to 6 pints per acre in sufficient water for thorough coverage as necessary. Repeat at two-week intervals.

**CORN AND SORGHUM:** Powdery Mildew - 4 to 6 pints per acre in sufficient water for thorough coverage. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites - 4 to 6 pints per acre in sufficient water for thorough coverage, when infestation first appears, repeating as necessary.

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COTTON: Strawberry (Atlantic) Mites, Lygus Mites - 2 to 8 pints per acre in sufficient water for thorough coverage beginning when infestation first occurs and every 7 to 14 days as necessary.

PEANUTS: Rust, Powdery Mildew, Leaf Spot - 2 to 4 pints per acre in sufficient water for coverage, beginning in early leaf stage and repeating every 10 to 24 days as necessary.

SMALL GRAINS: BARLEY, OATS, RYE, WHEAT: Powdery Mildew - 4 to 6 pints per acre in sufficient water for thorough coverage. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites, Strawberry (Atlantic) Mites 4 to 6 pints per acre in sufficient water for thorough coverage as necessary.

SOYBEANS: Powdery Mildew - 4 to 6 pints per acre in sufficient water for thorough coverage. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites, Strawberry (Atlantic) Mites - 4 to 6 pints per acre in sufficient water for thorough coverage beginning when infestation is first noted, repeating as necessary.

SUGAR BEETS: Powdery Mildew - 1 to 3 pints per acre in sufficient water for thorough coverage beginning when disease first appears, repeating at 3 to 4 week intervals

#### FLOWERS AND ORNAMENTALS

APPLICATION: To control the diseases and red spiders listed below, use SUFFA as a spray using 7 1/2 pints per 100 gallons of water. Applications should be made at 5 to 7-day intervals, beginning where the disease first appears and continuing until all dangers from the disease is past. During periods of humid or rainy weather, it may be necessary to make applications as often as every 2 to 3 days.

POWDERY MILDEW: Aster, Chrysanthemum, Cosmos, Dahlia, Daisy, Delphinium, Dogwood, Euonymus, Golden Fleece, Hibiscus, Honeysuckle, Hydrangea, Lady's Mantle, Ligustrum, Lilac, Crepe Myrtle, Phlox, Poplar, Silver Vine, Rose, Spiraea, Sunflower, Verbena, Willow and Zinnia.

LEAF SPOT: Calendula, Cherry Laurel, Clematis, Columbine, English Ivy, Foxglove, Hydrangea, Petunia, Phlox, Sage, Smilax and Snapdragon.

BLACK SPOT: Rose.

BOTRYTIS BLIGHT: Hydrangea.

RED SPIDERS: Arbovitae, Carnation, Cedars, Chrysanthemums, Clematis, Hydrangea, Rose, Snapdragon and Sweetpeas.

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## STORAGE AND DISPOSAL

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

**STORAGE INSTRUCTIONS:** Storage should be under lock and key in a ventilated room and secure from access by unauthorized persons and children. Storage should be in a cool, dry area away from any heat or ignition source. Do not stack plastic containers over 2 pallets high. Move containers by handles or case. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original containers only. If the contents are leaking or material is spilled follow these steps:

1. Contain spill, absorb with a material such as saw dust, clay granules or dirt.
2. Collect and place in suitable containers for disposal.
3. Wash area with water and soap to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Place leaking container in a plastic tub and transfer contents as soon as possible to an empty original container.
6. Do not allow runoff to enter sewer or contaminate water supplies.
7. Dispose of waste as indicated below:

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

## WARRANTY AND CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

In no case shall Drexel or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Drexel Chemical Company and is accepted as such by the Buyer.

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