

PM 21 19713-39

Page 1 of 11
File 11



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

FEB 10 1994

Barbara Brown
DREXEL CHEMICAL COMPANY
P.O. BOX 9306
MEMPHIS, TN. 38109

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/22/93 In Response to PR Notice 93-7
EPA Reg. No. 19713-39
DREXEL SUFFA

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canada ink on paper that
contains at least 50% recycled fiber

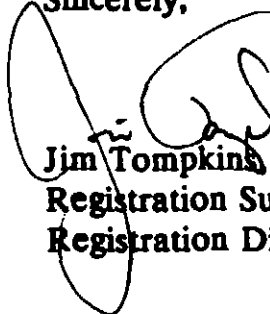
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

3 9 11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Barbara Brown
DREXEL CHEMICAL CO
BOX 9306
MEMPHIS TN 38109

Comment for: EPA Reg Nr.19713-39
DREXEL SUFFA

The following specific comments pertain to your WPS
labeling submission concerning the product
cited above:

Remove the statement "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." from its current position within
the Agricultural Use Box and place it above the Agricultural
Use Box.

Delete the crossed-out statements on your proposed label.
They are redundant statements or phrases.

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 10 1994

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

19713-39

DREXEL
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

EPA REG NO 19713-39
EPA EST NO

MANUFACTURED BY:
DREXEL CHEMICAL COMPANY
P.O. BOX 9306, MEMPHIS, TN 38109

NET CONTENTS: 5 GALLONS/18.9 LITRES

Revisions 7/93

<p>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.</p>
--

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. May cause irritation of nose, throat and skin. Avoid contact with eyes, skin and clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:
Long-sleeved shirt and long pants
Waterproof gloves
Shoes plus socks
Protective eyewear

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.

USER SAFETY RECOMMENDATIONS

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, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water when disposing of rinsate or equipment wash water.

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.

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

BEST AVAILABLE COPY

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 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.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

Personal Protective Equipment 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, soils or water is:

- Coveralls
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

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 application 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.

BEST AVAILABLE COPY

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

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 gallons 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 SPROUTS, 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 - 1 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 - 3/4 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.

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.

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: Arborvitae, Carnation, Cedars, Chrysanthemums, Clematis, Hydrangea, Rose, Snapdragon and Sweetpeas.

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.