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

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/30/93 In Response to PR Notice 93-7
EPA Reg. No. 19713-87
DREXEL SUFFA-8

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 SoyCandla Ink on paper that
contains at least 50% recycled fiber

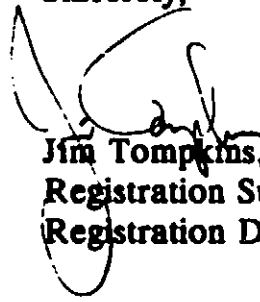
Submit the final printed labeling via the U.S. Postal Service to:

**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

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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.19713-87
DREXEL SUFFA-8

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.

19713-87

DREXEL

SUFFA 8

A FLOWABLE 8 POUND ELEMENTAL SULFUR

ACTIVE INGREDIENTS:

Elemental Sulfur 65.00%

INERT INGREDIENTS: 35.00%

TOTAL 100.00%

Product contains 8.0 lbs. of sulfur per gallon.

KEEP OUT OF THE REACH OF CHILDREN
CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 19713-87
EPA EST. NO. 19713-MS-1

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

NET CONTENTS: 2 1/2 GAL./9.45 LT.

6/16/88
Revisions 7/93

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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.

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

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with eyes, skin, and clothing. Wash thoroughly with soap. Remove contaminated 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 pesticides get 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 apply when weather conditions favor drift from areas treated. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL HAZARD

Keep away from heat, sparks, or flame.

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.

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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 8 with oil or within four (4) weeks of an oil application.

When DREXEL SUFFA 8 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 8 per 100 gallons of water for use in a full coverage spray.

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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 8 to settle and may necessitate manual stirring to redisperse.

APPLE, PEAR - Scab: Prebloom through calyx sprays 2 1/2 to 5 1/4 cups. Cover sprays 3/4 to 1 1/2 pints. **Powdery mildew:** Prebloom through calyx sprays 2 1/2 to 5 1/4 cups. Cover sprays 1 1/2 pints.

PEACH - Brown rot, powdery mildew, scab: Pink and bloom sprays 2 1/2 to 5 1/4 cups. Petal fall, shuck and cover sprays 3/4 to 1 1/3 pints.

CHERRY, PLUM, PRUNE - Brown rot, leaf spot: Pink and bloom sprays 2 1/2 to 5 1/2 cups. Petal. shuck and cover sprays 1/2 to 1 1/3 pints.

CITRUS - (Grapefruit, Lemons, Limes, Oranges, Tangelos and Tangerines). Rust mite: 3/4 to 3 pints. Do not apply within 4 weeks of an oil application.

PEANUTS - Rust: Apply 1 1/2 to 3 pints per acre in sufficient water for through coverage. Begin application approximately 6 weeks after planting. Repeat at 7 to 10 day intervals as long as rust control is required. Do not apply within 4 weeks of an oil application.

COTTON - Atlantic Mite: 1 1/2 pints for early season control and up to 6 pints for mid to late season control.

GRAPES - (California only) - Powdery mildew: 3/4 to 1 1/2 pints per 100 gallons water, maximum of 6 pints DREXEL SUFFA 8 per acre in spring and summer. Make first application when shoots are 6 to 8 inches long and third at or about bloom stage.

The timing, rate and number of applications will vary with local conditions. Consult State Agricultural Service representative or State Agricultural Experiment Station in your region for specific information. Follow USE PRECAUTIONS given on this label.

POTATOES - Powdery mildew: Use 2 1/4 to 3 pints in 8 gallons water per acre by air. Apply at first sign of infection and repeat at 3 week intervals.

STRAWBERRIES - Powdery mildew: use 3/4 pints. 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.

SUGAR BEETS - Powdery mildew: use 3/4 to 2 1/4 pints in 5 to 8 gallons of water per acre by air. Apply at first sign of infection and repeat at 3 week intervals.

TOMATOES - Tomato Russet Mite: Use 3 pints to 6 pints per acre depending upon size of plants. Use full coverage spray.

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 a suitable container for disposal.
3. Wash area with water and soap to remove remaining pesticide.
4. Follow washing with clean water rinse.
5. Place a leaking container in a plastic tub and transfer contents as soon as possible to an empty original container.
6. Do not allow run off 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 incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY - 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.