



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

JAN 14 1994

Barbara Brown
DREXEL CHEMICAL CO
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. 19713-238
DREXEL SULFUR 90W

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 comment 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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

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Subject: Label Amendment Submission of 07/30/93
to Comply with WPS Labeling Requirements
EPA Reg Nr. 19713-238
DREXEL SULFUR 90W

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.

ACCEPTED
with COMMENTS
in EPA Letter Dated
JAN 14 1994

SULFUR 90W
A WETTABLE SULFUR

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-238

ACTIVE INGREDIENT:

Elemental Sulfur 90.0%

INERT INGREDIENTS: 10.0%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

CONTENTS:

EPA REG. NO. 19713-238
EPA EST. NO. 19713-

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

Revisions 7/93

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 IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation develops.
IF 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: Causes eye and skin irritation. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing of dust or spray mist. Avoid contact with eyes, skin or 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, 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 HAZARDS

Keep away from heat, sparks or flame.

APPLICATION INSTRUCTIONS**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

BEST AVAILABLE COPY

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 SULFUR 90W with oil or within two (2) weeks of an oil application to all crops except Citrus, for which a three (3) week interval is required.

When DREXEL SULFUR 90W 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 personal injury, excessive residues, unsatisfactory control or other unintended consequences.

When growing crops for processing, consult the processor before applying SULFUR 90W. 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 pounds of DREXEL SULFUR 90W per 100 gallons of water for use in a full coverage spray.

As a preventative measure or for light infestations, use the lower dosage rates. For heavy infestations, use the higher dosage rates.

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 SULFUR 90W to settle and may necessitate manual stirring to redisperse.

FRUIT AND NUT CROPS

ALMONDS: Brown Rot, Powdery Mildew, Leaf Spot, Scab - 2 to 6 lbs. per 100 gals. of water - Apply pre-bloom, 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 - 2 to 6 lbs. per 100 gals. as needed when infestation is noted. Do not apply within two (2) weeks of an oil application.

APPLES: Scab, Powdery Mildew - 2 to 6 lbs. per 100 gals. of water - Apply pre-bloom, bloom, petal fall, shuck and as a cover spray throughout the season. Mites - Blister, European Red, and Two-Spotted - 2 to 6 lbs. per 100 gals. as needed when infestation is noted.

CANE FRUITS - BLACKBERRIES, BOYSENBERRIES, GOOSEBERRIES, LOGANBERRIES, RASPBERRIES: Powdery Mildew - Apply 1 to 3 lbs. per 100 gals. of water or 6 to 15 lbs. 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 - 2 to 6 lbs. per 100 gals. of water - Appl/ 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 - 2 to 6 lbs. per 100 gals. as needed.

CITRUS: Scale Crawlers, Mites-Rust, Six-Spotted, Citrus, Flat, Yuma, Silver - 2 to 4 lbs. per 100 gals. 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 - 2 lbs. per 100 gals. of water of 2 to 5 lbs. 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 - 2 to 6 lbs. per 100 gals. of water pre-bloom, bloom, petal-fall and in cover sprays at 7 - 14 day intervals. Peach Silver Mites - 2 to 6 lbs. per 100 gals of water as needed when infestations appear.

PEARS: Scab, Powdery Mildew - 2 to 6 lbs. per 100 gals. of water - pre-bloom, petal fall, shuck and as a cover spray throughout the season. Mites - Blister, European Red, Two-Spotted - 2 to 6 lbs. per 100 gals. of water as needed. Sensitive varieties such as D'Anjou and Comice may be injured by sulfur and certain climatic conditions.

PLUMS AND PRUNES: Brown Rot, Scab, Powdery Mildew, Rust, Leaf Spot - 2 to 6 lbs. per 100 gals. of water pre-bloom, bloom, petal fall and as a cover spray at 7 - 10 day intervals. Silver Mites - 2 to 6 lbs. per 100 gals. of water as needed.

STRAWBERRIES: Powdery Mildew - 1 to 3 lbs. per 100 gals. of water of 5 to 10 lbs. per acre. Sulfur may injure strawberries under certain climatic conditions.

WALNUTS: Mites - European Red, Pacific, Almond, Two-Spotted - 2 to 4 lbs. per 100 gals. 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 10 to 20 lbs. per acre after cutting stops, and 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 4 to 6 lbs. per acre as necessary.

BEANS AND PEAS: Powdery Mildew, Rust, and Leaf Spot - 3 - 6 lbs. per acre at first sign of infection and every 7 to 14 days as necessary. Mites - Two-Spotted, Pacific, Strawberry (Atlantic) - 3 to 6 lbs. per acre as necessary.

CARROTS: Powdery Mildew - 5 to 10 lbs. per acre. Begin at first sign of disease and repeat at 7 to 10 day intervals.

COLE CROPS: Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Collards, Kale - Powdery Mildew - 3 to 5 lbs. per acre 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 5 lbs. per acre as necessary.

MELONS: Powdery Mildew - 15 to 20 lbs. per acre. 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 - 5 to 10 lbs. per acre. Begin before disease is expected to appear and repeat as necessary.

PEPPERS: Powdery Mildew, Leaf Spot - 3 to 5 lbs. per acre beginning in the early leaf stage and repeating every 10 to 14 days as necessary.

POTATOES: Powdery Mildew, Leaf Spot - 3 to 5 lbs. per acre. Apply when disease first appears and repeat at 3 to 4 week intervals. Two-Spotted Mites - 3 to 5 lbs. per acre as necessary.

TOMATOES: Tomato Russet Mite - 2 to 5 lbs. 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 - 3 to 5 lbs. per acre as necessary. Repeat at two week intervals.

CORN AND SORGHUM: Powdery Mildew - 3 to 5 lbs. per acre. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites - 3 to 5 lbs. per acre when infestation first appears, repeating as necessary.

COTTON: Strawberry (Atlantic) Mites, Lygus Mites - 6 to 9 lbs. per acre beginning when infestation first occurs and every 7 to 14 days as necessary.

PEANUTS: Rust, Powdery Mildew, Leaf Spot - 3 to 5 lbs. per acre beginning in early leaf stage and repeating every 10 to 24 days as necessary.

SMALL GRAINS: Barley, Oats, Rye, Wheat: Powdery Mildew - 3 to 5 lbs. per acre. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites, Strawberry (Atlantic) Mites - 3 to 5 lbs. per acre as necessary.

SOYBEANS: Powdery Mildew - 3 to 5 lbs. per acre. Apply when disease appears and repeat as necessary. Two-Spotted Mites, Pacific Mites, Strawberry (Atlantic) Mites - 3 to 5 lbs. per acre beginning when infestation is first noted, repeating as necessary.

SUGAR BEETS: Powdery Mildew - 3 to 5 lbs. per acre 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 SULFUR 90W as a dust or spray using 6 lbs. per 100 gals. of water. Applications should be made at 5 to 6 day intervals, beginning when the disease or mites first appear and continuing until all danger 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.

STORAGE AND DISPOSAL

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

STORAGE INSTRUCTIONS: Storage should be under lock and key 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 over 2 pallets high. Move bags carefully so as not to tear or puncture. Do not move containers from one area to another unless they are securely sealed. Keep container tightly sealed when not in use. Do not allow bags to become wet or be stored in a damp humid area. Keep away from any puncture source. Avoid storage near water supplies, food, feed and fertilizer to avoid contamination. Store in original container only. If the content are leaking or material is spilled follow these steps:

1. Collect and place in suitable containers for disposal.
2. Wash area with water and soap to remove remaining pesticide.
3. Follow washing with clean water rinse.
4. Do not allow run-off to enter sewer or contaminate water supplies.
5. Dispose of waste as indicated below:

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

CONTAINER DISPOSAL: Completely empty bag into application equipment. then dispose of bag in a sanitary landfill or by 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 - liable. 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.