

Reg # 19713-282

PM-21

Labeling

1911



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

DEC 9 1993

Barbara Brown
DREXEL CHEMICAL COMPANY
Box 9306
Memphis, TN 38109

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/30/93 in Response to PR Notice 93-11
EPA Reg. No. 19713-282
IDA INC. SULFUR 8

IMPORTANT NOTICE: This Letter Requires You to Submit a Notification to the Office of Compliance Monitoring within 20 Days.

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 listed on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

SERIOUS ERROR(S) ON SUBMITTED LABELING:

EPA has determined that one or more of the errors on the labeling you submitted to the Agency is categorized as "serious" as defined in PR Notice 93-11. In general, serious errors are those that may create a potential for harm to workers, handlers, other persons, or the environment; or those that prevent the achievement of the basic goals of the Worker Protection Standard (WPS) or FIFRA.

YOU MUST NOT SELL OR DISTRIBUTE (INCLUDING RELEASE FOR SHIPMENT) ANY PRODUCT BEARING THE SUBMITTED LABELING. Sale or distribution of any product with the incorrect labeling is a violation of FIFRA that could result in initiation of an action for civil penalties and/or cancellation of your product. This matter has been referred to the Office of Compliance Monitoring (OCM) for further action.

YOU MUST SUBMIT A NOTIFICATION TO THE OFFICE OF COMPLIANCE MONITORING WITHIN 20 DAYS OF THE DATE OF THIS LETTER.



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Each notification must include the following information:

1. Registrant 's name and address.
2. EPA Registration number of the product for which the labeling was submitted.
3. Whether any product already has been sold or distributed (this includes released for shipment) bearing the submitted labeling.

In addition, the notification must include the following information, IF you have already sold or distributed any product bearing the submitted labeling:

1. Quantity of the product that has been sold or distributed.
2. EPA Producing Establishment number.
3. Location of the product, if known.
4. Proposed plan for assuring that product with the incorrect labeling in your control, as well as that in the hands of dealers/distributors/users, will be corrected. The plan must include your proposal for assuring that the labeling is corrected as soon as possible.

Submit the notification to:

Michael Wood, Director
Compliance Division, (7203)
Worker Protection Notification
Office of Compliance Monitoring
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460

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Failure to submit a notification also may result in initiation of an action under FIFRA for civil penalties, if you sold or distributed (this includes released for shipment) product bearing the incorrect labeling.

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IN ADDITION, YOU SHOULD CONTACT IMMEDIATELY THE PERSONS TO WHOM YOU SOLD OR DISTRIBUTED YOUR PRODUCT AND INFORM THEM NOT TO SELL OR DISTRIBUTE ANY PRODUCT WITH THE INCORRECT LABELING.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the 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 neither been reviewed nor 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:

Submit the required notification. Then 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 as amended

AND

- **WITHIN** one year from date of this acceptance.

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

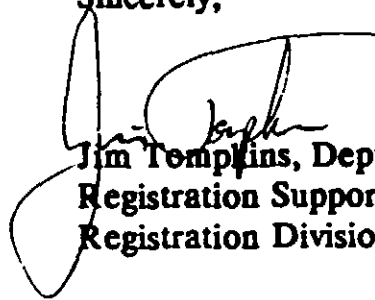
Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

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Hand or courier deliveries of final 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

cc: Office of Compliance Monitoring

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DREXEL CHEMICAL COMPANY
IDA, INC. SULFUR 8
19713-282

ORIGINAL SUBMISSION

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.

The correct restricted entry interval (REI) for this product is 24 hours. Your REI statement must read: "Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours." The exact location is shown in Section F on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

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IDA, INC

SULFUR 8

A Flowable 8 Pound Elemental Sulfur

ACTIVE INGREDIENT:

Elemental Sulfur 65.00%

INERT INGREDIENTS: 35.00%

TOTAL. 100.00%

Product contains 8.0 lbs. of sulfur per gallon.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Manufactured By: Drexel Chemical Company
P.O. Box 9306
Memphis, TN 38109

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 9 1993

EPA Reg. No. 19713-282

EPA Est. No.

Net Contents:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
19713-282

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 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: Causes eye and skin irritation. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist. 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

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 gets 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 rinsate or equipment washwater.

PHYSICAL HAZARDS: 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.

NOTE: DO NOT APPLY THROUGH ANY TYPE IRRIGATION SYSTEM.

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

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

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 (Reentry Interval - 12 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 Sulfur 8 with oil or within four (4) weeks of an oil application.

When Sulfur 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 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.

Shake well before using.

Pour recommended amount into partially filled spray tank. Keep agitator running during filling and spraying operation. Do not

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allow mixture to stand. Failure to maintain agitation will cause Sulfur 8 to settle and may necessitate manual stirring to redisperse.

DIRECTIONS FOR DILUTION

DILUTE APPLICATIONS: GROUND APPLICATION: Apply specified rate in 20 to 60 gallons of water per acre. **ORCHARD APPLICATION:** Apply specified rate in 100 to 800 gallons of water per acre.

CONCENTRATE APPLICATION: GROUND APPLICATION: Apply specified rate in not less than 5 gallons of water per acre. **ORCHARD APPLICATION:** Apply specified rate in 20 to 100 gallons of water per acre. Special concentrate equipment is necessary for these uses.

AIR APPLICATION: Apply specified rate in 3 to 20 gallons of water per acre Orchard rates should not be applied in less than 10 gallons of water per acre.

USE LOWER RECOMMENDED RATE WHEN USING CONCENTRATE EQUIPMENT. USE HIGHER RATES WHEN USING DILUTE APPLICATION.

APPLE, PEAR

Scab: Prebloom through calyx sprays: 2 1/4 to 5 1/4 cups. Cover sprays: 3/4 to 1 1/2 pints. Powdery mildew: Prebloom through calyx sprays: 2 1/4 to 5 1/4 cups. Cover sprays: 1 1/2 pints.

PEACH

Brown rot, Powdery mildew, Scab: Pink and bloom sprays: 2 1/4 to 5 1/4 cups. Petal fall, shuck and cover sprays: 3/4 to 1 1/3 pints.

NOTE: Brown rot blossom blight: apply at bloom or early petal fall. Repeat as necessary. Brown rot of fruit: begin application 4 to 5 weeks before harvest and continue at weekly intervals.

CHERRY, PLUM, PRUNE

Brown rot, Leaf spot: Pink and bloom sprays: 2 1/4 to 5 1/4 cups. Petal, shuck and cover sprays: 1/2 to 1 1/3 pints.

NOTE: Brown rot blossom blight: apply at bloom or early petal fall. Repeat as necessary. Brown rot of fruit: begin application 4 to 5 weeks before harvest and continue at weekly intervals.

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.

NOTE: Apply sprays November thru May.

PEANUTS

Rust: Apply 1 1/2 to 3 pints per acre in sufficient water for thorough 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 Sulfur 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 1/2 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 pint. 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 canner's recommendation.

SUGAR BEETS

Powdery mildew: Use 3/4 to 2 1/4 pints in 5 to 8 gallons 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.

NOTE: Begin application when infestation first occurs and repeat as necessary, or with the regularly scheduled insect program.

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:

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1. Contain spill, absorb with a material such as saw dust, clay granules or dirt.
2. Collect and place in 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 any 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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 and is accepted as such by the Buyer.

