

PM 21 19713-295

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

REG 21 0000

Barbara Brown  
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P.O. Box 9306  
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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 08/30/93 in Response to PR Notice 93-7  
EPA Reg. No. 19713-295  
IDA 'S SULFA-80

**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 93-1'. 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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DREXEL  
SULFA 80  
Dry Flowable Micronized Sulfur

ACTIVE INGREDIENT:  
Sulfur . . . . . 80%  
INERT INGREDIENTS . . . . . 20%  
100%

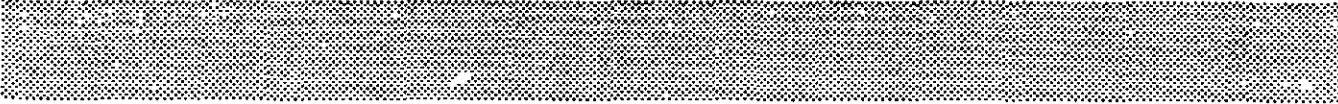
KEEP OUT OF REACH OF CHILDREN  
CAUTION

**STATEMENT OF PRACTICAL TREATMENT**

IF ON SKIN: Wash with soap and plenty of water. Get medical attention.

IF IN EYES: Flush eyes with plenty of water for at least fifteen minutes and get medical attention.

EPA REGISTRATION NUMBER: 19713-295  
EPA ESTABLISHMENT NUMBER:  
MANUFACTURED BY: DREXEL CHEMICAL COMPANY



ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
DEC 22 1993  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
19713-295

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Avoid breathing spray mist. Harmful if inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes, or clothing. ~~Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.~~

**PERSONAL PROTECTIVE EQUIPMENT**

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Follow manufacturers 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, 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 treated areas. Do not contaminate water when disposing of rinsate or equipment wash water.

**PHYSICAL AND CHEMICAL HAZARDS**

Sulfur dust suspended in air ignites easily. Keep away from heat, sparks, and flame. Do not smoke while applying this product.

**REENTRY-STATEMENT**

~~"Do not enter into treated area until at least 24 hours after the completion of application to the area unless wearing the protective clothing listed below. During early reentry into treated areas (less than 24 hours after the completion of application) to perform hand labor tasks, wear long pants (or coveralls), long-sleeved shirt, shoes, socks, chemical/water resistant gloves, goggles or face shield."~~

"Pesticide handlers--During mixing, loading and application of this product, wear long pants (or coveralls), long-sleeved shirt, shoes, socks, chemical/water-resistant gloves, and goggles or face shield."

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.--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--"Area treated with-----on (date).--Do not enter without appropriate protective clothing for 24 hours."

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and 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. PPE 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, soil, or water is:

- Coveralls
- Waterproof gloves
- Shoes plus socks

Pour needed amount into spray tank under agitation. If necessary, add a few drops of oil to avoid foaming. Application of this material through any type of irrigation equipment is prohibited.

**USE PRECAUTIONS**

Some crops are susceptible to injury from sulfur under certain climatic conditions. The user is advised not to use on any crop unless local use has proven sulfur to be safe in that locality.

Sulfur may burn foliage or cause fruit injury when temperatures are excessively high. Do not apply to or allow spray drift on sulfur sensitive plants such as Anjou pears, apricots, cranberries, or spinach. Do not apply with or following an oil application for 21 to 60 days. Do not apply oil for 14 days following treatment, except for dormant sprays on pears. Follow all other label directions or precautions as indicated.

When growing crops for processing consult processor before applying sulfur.

**DIRECTIONS FOR DILUTION**

Dilute Application: 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: Applied 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 rates when using concentrate equipment. Use high rates when using dilute applications.

**CROPS**

Almonds, Cherries, Plums, Prunes, Peaches, Nectarines: Brown rot blossom blight, Cherry leafspot, Prune rot, Powdery mildew, Scab, Leafspot, Silver mite, Flat mite, Red spider mite - Apply 10 to 30 lbs. per acre. Apply at bloom or early petal fall. Repeat as necessary, usually 10 to 14 days after a period of wet weather. For brown rot of fruit, apply when fruit starts to ripen.

Apples, Pears: Powdery mildew, Scab, Blister mite, Red spider mite - Apply 10 to 30 lbs. per acre. Do not apply to anjou pears. Apply pre-bloom and petal fall. Apply with cover sprays throughout the season.

**Asparagus:** Rust - Apply 10 to 30 lbs. per acre. Use after cutting stops. Irrigate and cultivate before applying the sulfur. Repeat at 7 to 10 day intervals throughout the season.

**Avocados:** Brown mite - Apply 10 to 30 lbs. per acre as needed.

**Beans, Peas, Broccoli, Brussels sprouts, Cabbage, Cauliflower, Celery, Lettuce, Collards, Kale, Mustard Greens, Rutabagas, Turnips, Peppers, Potatoes:** Powdery mildew, Rust, Red spider mite - Apply 3 to 10 lbs. per acre. Start in early leaf stage. Repeat application every 10 to 14 days with or without pesticides immediately after a rain.

**Blackberries, Blueberries, Boysenberries, Currants, Dewberries, Gooseberries, Huckleberries, Loganberries:** Powdery mildew - Apply 6 to 15 lbs. per acre. Begin when new shoots are 6 inches long and before blossoms open or when disease first appears. Repeat at 7 to 10 day intervals or as necessary.

**Carrots, Onions, Garlic:** Petrobia mite and Powdery mildew - Apply 3 to 10 lbs. per acre when the disease first appears and repeat as needed.

**Citrus:** Flat mite, Silver mite, Rust mite, Broad mite, Bud mite, Red spider mite, Six spotted mite, Thrips, Yuma spider mite - Apply 8 to 20 lbs. per acre. Apply in any spray - NOT CONTAINING OIL - Do not apply within 21 days of an Oil Spray application.  
**Corn, Sweet Corn, Cereal Grains including Wheat, Rice, Barley, Oats, Milo and Rye, Sorghum, Soybeans:** For suppression of the Red spider mite, Two-spotted mite, Grass banks mite, and Pacific mite; for control of the Atlantic mite (small grain only) and for control of Powdery mildew (soybeans only) - Apply 6 lbs. per acre. For soybeans, apply 7.5 to 12.5 lbs. per acre. Apply when disease first appears and repeat as necessary or with the regularly scheduled insect program.

**Cotton, Alfalfa:** Atlantic mite, Red spider mite - Apply 3 to 5 lbs. per acre as needed.

**Cucurbits:** Powdery mildew - Apply 2 to 4 lbs. per acre. Cucumber, Watermelons, Cantaloupe and Squash are very sensitive to sulfur. Never apply more than 1.25 pounds of Thiolux per acre per application during periods of high temperatures.

**Grapes:** Powdery mildew, Bud mite, Blister mite, Red spider mite - Apply 6 lbs. per acre. Apply in late dormant or with cutworm spray, early shoot period and through season on 14 day schedule or with pesticides.

**Mangoes:** Powdery mildew - Apply 10 to 30 lbs. per acre. Begin before bloom. Repeat in bloom, after fruit set and 3 weeks later or as necessary.

Melons/Squash: Powdery mildew - Use 10 to 15 lbs. per acre. Treat when the disease first appears and repeat as necessary. Sulfur can injure plants, especially when the temperature reaches 95| F. Do not use on sulfur sensitive varieties.

Peanuts: Powdery mildew, Rust, Red spider mite, Leaf spot - Apply 3 to 5 lbs. per acre. Start in early leaf stage. Repeat applications as necessary, usually 10 to 24 days.

Raspberries: Powdery mildew - Apply 6 to 15 lbs. per acre. Spray each week starting at first bloom color. Continue until all fruit is set, then repeat as weather requires.

Spearmint, Peppermint: Powdery mildew - Apply 4 to 6 pounds per acre when mint is 5 to 6" tall or when disease appears. Repeat twice, at 30 day intervals. Do not apply within 30 days of harvest.

Strawberries: Powdery mildew, Red spider mite - Apply 5 to 10 lbs. per acre. Start in early leaf stage, repeat application with or without pesticides. For powdery mildew, begin at first signs of disease and repeat as necessary. Do not use on sulfur sensitive varieties.

Sugar Beets, Table Beets: Powdery mildew, Red spider mite - Apply 5 to 10 lbs. per acre at 10 to 30 day intervals with or without other pesticides as soon as the first symptoms appear.

Tomatoes: Russet mite, Powdery mildew - Apply 3 to 10 lbs. per acre. Begin as soon as first symptoms appear. Thorough coverage is required.

Walnuts, Pecans, macadamias: Pacific mite, Almond mite, Two-spotted mite, Red spider mite, Broad mite - Apply 10 to 30 lbs. per acre and repeat as necessary. Apply with mite sprays during season to increase the effectiveness. CAUTION: Certain varieties of walnuts and pecans are sensitive to sulfur sprays under certain conditions. Do not apply unless the varieties are known to be tolerant of sulfur.

**ORNAMENTALS**

Apply 3 to 10 lbs. per acre by ground or 3 to 20 lbs. per acre by air in aqueous spray ensuring complete plant coverage. Begin when disease first appears and repeat at 5 to 10 day intervals.

Asters, Carnations: For control of Powdery mildew.

Calendula, Cherry laurels, Chrysanthemums, Hollyhock, Smilax: For control of Leaf spot and Powdery mildew.

Clematis, Columbine, Ivy (English), Laurel, Petunia, Sage: For control of Leaf spot.

Cosmos, Crepe Myrtle, Dahlia, Delphinium, Gladiolus, Ligustrum, Sunflowers, Sweet peas, Violets, Zinnias: For control of Powdery mildew.

Roses: For control of Powdery mildew and Black spot.

**NUTRIENT USE**

Sulfa 80 applications will provide sulphur for the plants' nutrient requirement and should be considered in the total plant nutrient applications. Sulfa 80 can be used as a micronutrient supplement by either foliar or soil application. Sulfa 80 is recommended on the following crops:

Alfalfa, almonds, avocados, apples, barley, all beans, broccoli, cabbage, cauliflower, carrots, celery, citrus, corn, grapes, lawns, lettuce, milo, melons, nectarines, rice, pears, peaches, pecans, peppers, plums, prunes, potatoes, peanuts, sorghum, soybeans, sugar beets, sweet corn, sugar cane, strawberries, tomatoes, turnips, walnuts, watermelons, wheat and most other crops. Consult your State Agricultural Experimental Station or Extension Specialist for advice in selecting treatment to best fit local conditions.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Must be stored under dry conditions.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Do not contaminate water when disposing of equipment washwaters.

**Container Disposal:** Completely empty bag into application equipment. Then dispose of empty 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 test 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 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 the seller and is accepted as such by the Buyer.