



019713-00295-042699

Printed: 10:34:50 Friday, 28 May, 1999 # 36 / 3156

Systems Integration Group, Inc.



United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 19713-295	2. EPA Product Manager MS. MARY WALLER	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREXEL SULFA 80	PM# -21 FUNGICIDE BRANCH -	
5. Name and Address of Applicant (Include ZIP Code) Drexel Chemical Company, 1700 Channel Avenue MEMPHIS, TN 38113 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION

APR 26 1999

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

We are submitting, herewith, 2 copies of the CSF adding the water-soluble packaging to an existing non-WSP registration. In accordance with PR Notice 94-8, the water-soluble film and ink declared in the CSF being submitted, herewith, have been previously accepted by the Agency and are exempted from the tolerance requirements under 40 CFR 180.1001. A copy of the label (295SP-0499) with revisions relating to the WSP (revisions were shaded for your easy reference) as well as the certification statement as per PR Notice 94-8 are also submitted, herewith.
 Thank you.

Alternative CSF dated 3-30-99.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/>
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name LUZ G PIWONKA	Title REGISTRATION MANAGER	Telephone No. (Include Area Code) (901) 774-4370
-----------------------	-------------------------------	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received

(Stamp)

2. Signature <i>Luiz G. Piwonka</i>	3. Title REGISTRATION MANAGER	6. Date Application Received (Stamp)
4. Typed Name LUZ G PIWONKA	5. Date 4/6/99	

2 of 4

Note to EPA

Shaded text added for water soluble formulation.



Sulfa 80 WS

Micronized Sulfur

ACTIVE INGREDIENT:

Sulfur 80.0%

OTHER INGREDIENTS: 20.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See FIRST AID Below

EPA Reg. No. 19713-295

EPA Est. No. 19713-GA-1

Net Contents:

25 Pounds

FIRST AID

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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Avoid breathing spray mist. Harmful if inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants, waterproof gloves, shoes plus socks and 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

Users should: 1) Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. 2) 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. 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.

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 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. 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, 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 (REI) and notification to workers. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval 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, and protective eyewear.

DIRECTIONS FOR ORIGINAL FORMULATION

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.

DIRECTIONS FOR USE OF WATER SOLUBLE BAGS

Paks containing this product are water soluble. Do not allow pak to become wet prior to adding to the spray tank. Do not handle paks with wet hands. To prepare the spray mixture, drop the required number of unopened paks into spray tank while filling with the appropriate amount of water. Operate the agitator while mixing. Depending on the water temperature and the degree of agitation, the paks should be completely dissolved in approximately 5 minutes from the time they are added to the water. Use the specified dosage of this product in the amount of water necessary to give complete coverage. Determine the total amount to be added to the spray tank based on the rates in the "Crop" section.

Note: Product containing BORON will prevent the water soluble packet from dissolving. BORON products must only be added after packet(s) have completely dissolved.

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 Apricots, Cranberries, d'Anjou pears 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.

NOTIFICATION

APR 26 1999



Manufactured By:

Drexel Chemical Company

P.O. BOX 13327, MEMPHIS, TN 38111-0327

SINCE 1972

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.

Crop	Disease	Rate per Acre	Number of Water Soluble Paks
Alfalfa	Atlantic mite, Red spider mite	3 to 5 lbs.	3 to 5 paks per 25 acres
	USE INSTRUCTIONS: Apply as needed.		
Almonds, Cherries, Plums, Prunes	Brown rot blossom blight, Cherry leaf spot, Prune rot, Powdery mildew, Scab, Leaf spot, Silver mite, Flat mite, Red spider mite	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: 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	Blister mite, Powdery mildew, Red spider mite, Scab	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: Do not apply to D'anjou pears. Apply pre-bloom and petal fall. Apply with cover sprays throughout the season.		
Asparagus	Rust	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: Use after cutting stops. Irrigate and cultivate before applying this product. Repeat at 7 to 10 day intervals throughout the season.		
Avocados	Rust	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: Apply as needed.		
Beans, Broccoli, Brussels sprouts, Cabbage, Cauliflower, Celery, Collards, Kale, Lettuce, Mustard greens, Peas, Peppers, Potatoes, Rutabagas, Turnips	Powdery mildew, Red spider mite, Rust	3 to 10 lbs.	3 to 10 paks per 25 acres
	USE INSTRUCTIONS: Start applications in early leaf stage. Repeat application every 10 to 14 days with or without pesticides immediately after rain.		
Blackberries, Blueberries, Boysenberries, Gooseberries, Huckleberries, Loganberries	Powdery mildew	6 to 15 lbs.	2 to 5 paks per 8 acres
	USE INSTRUCTIONS: Begin applications when new shoots are 6 inches long and before blossoms open or when disease first appears. Repeat at 7 to 10 day intervals as necessary.		
Carrots, Garlic, Onions	Petrobia mite, Powdery mildew	3 to 10 lbs.	3 to 10 paks per 25 acres
	USE INSTRUCTIONS: Apply when the disease first appears and repeat as needed.		
Cereal grains (barley, oats, rice, rye, wheat), Corn, Milo, Sorghum, Soybeans, Sweet corn	For suppression of: Grass banks mite, Pacific mite, Red spider mite, Two-spotted mite. For control of: Atlantic mite (small Grain only) and Powdery mildew (Soybeans only)	6 lbs.	3 paks per 12.5 acres
	USE INSTRUCTIONS: Apply when disease first appears and repeat as necessary or with the regularly scheduled Insect program.		
Citrus	Broad mite, Bud mite, Flat mite, Red spider mite, Rust mite, Silver mite, Six-spotted mite, Thrips, Yuma spider mite	8 to 20 lbs.	2 to 5 paks per 6 acres
	USE INSTRUCTIONS: Apply in any spray NOT CONTAINING OIL. Do not apply within 21 days of an oil spray application.		

Crop	Disease	Rate per Acre	Number of Water Soluble Paks
Cotton	Atlantic mite, Red spider mite	3 to 5 lbs.	3 to 5 paks per 25 acres
	USE INSTRUCTIONS: Apply as needed.		
Grapes	Blister mite, Bud mite, Powdery mildew, Red spotted mite	6 lbs.	3 paks per 12.5 acres
	USE INSTRUCTIONS: Apply in late dormant or with Cutworm spray, early shoot period and through season on a 14-day schedule or with pesticides.		
Macadamias, Pecans, Walnuts	Almond mite, Broad mite, Pacific mite, Red spider mite, Two-spotted mite	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: Apply as necessary. Apply with Mite sprays during season to increase the effectiveness. NOTICE: 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.		
Mangoes	Powdery mildew	10 to 30 lbs.	2 to 6 paks per 5 acres
	USE INSTRUCTIONS: Begin application before bloom. Repeat in bloom, after fruit set and 3 weeks later or as necessary.		
Melons, Squash	Powdery mildew	10 to 15 lbs.	2 to 3 paks per 5 acres
	USE INSTRUCTIONS: Treat when the disease first appears and repeat as necessary. NOTE: Sulfur can injure plants, especially when the temperature reaches 95° F. Do not use on sulfur sensitive varieties		
Peanuts	Leaf spot, Powdery mildew, Red spider mite, Rust	3 to 5 lbs.	3 to 5 paks per 25 acres
	USE INSTRUCTIONS: Start applications in early leaf stage. Repeat applications as necessary, usually 10 to 24 days.		
Peppermint, Spearmint	Powdery mildew	4 to 6 lbs.	2 to 3 paks per 12.5 acres
	USE INSTRUCTIONS: Apply 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.		
Raspberries	Powdery mildew	6 to 15 lbs.	2 to 5 paks per 8 acres
	USE INSTRUCTIONS: Spray each week starting at first bloom color. Continue until all fruit is set, then repeat as weather requires.		
Strawberries	Powdery mildew, Red spider mite	5 to 10 lbs.	1 to 4 paks per 5 acres
	USE INSTRUCTIONS: Start applications 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	5 to 10 lbs.	1 to 4 paks per 5 acres
	USE INSTRUCTIONS: Apply at 10 to 30 day intervals with or without other pesticides as soon as the first symptoms appear		
Tomatoes	Red spider mite, Russet mite	3 to 10 lbs.	3 to 10 paks per 25 acres
	USE INSTRUCTIONS: Begin applications as soon as first symptoms appear. Thorough coverage is required.		

4084

Ornamental	Disease	Rate per Acre	Number of Water Soluble Paks
Asters, Carnations	Powdery mildew	3 to 10 lbs.	3 to 10 paks per 25 acres
Calendula, Cherry laurel, Chrysanthemums, Hollyhock, Smilax	Leaf spot, Powdery mildew		
Clematis, Columbine, Ivy (English), Laurel, Petunia, Sage	Leaf spot		
Cosmos, Crepe myrtle, Dahlia, Delphinium, Gladiolus, Ligustrum, Sunflowers, Sweet peas, Violets, Zinnias	Powdery mildew		
Roses	Black spot, Powdery mildew	3 to 10 lbs. by ground	3 to 10 paks per 25 acres
		3 to 20 lbs. by air	3 to 20 paks per 25 acres

USE INSTRUCTIONS: Apply in aqueous spray ensuring complete plant coverage. Begin when disease first appears and repeat at 5 to 10 day intervals.

NUTRIENT USE

Applications of this product will provide sulphur for the plants' nutrient requirements and should be considered in the total plant nutrient applications. This product can be used as a micronutrient supplement by either foliar or soil application. This product 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 and disposal. Must be stored under dry conditions.

PESTICIDE STORAGE: 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. Avoid storage at high temperatures. 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 containers tightly sealed when not in use. Do not allow bags to become wet or store 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 containers only. If the contents are leaking or material is spilled follow these steps:

1. Collect and place in suitable containers for disposal.
2. Wash area with soap and water to remove remaining pesticide.
3. Follow washing with clean water rinse.
4. Do not allow runoff 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. Do not contaminate water when disposing of equipment washwaters.

WATER SOLUBLE PAKS: Carefully open outer bag. Never open the water soluble pouch. After partial use of internal paks, fold and roll outer bags back down, clamp and close tightly.

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