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

MAR 14 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Barbara Brown
DREXEL CHEMICAL CO.
BOX 9306
MEMPHIS, TN 38109

Subject Label Amendment Submission of 08/30/93 in Response to PR Notice 93-7
EPA Reg. No. 19713-296
IDA'S SULFA-92

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.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

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

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.

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.

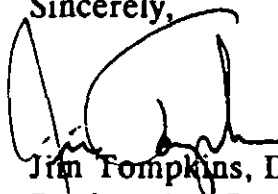
Submit the final printed labeling via the U.S. Postal Service to:

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

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,

A handwritten signature in black ink, appearing to read "Jim Tompkins", written over a circular stamp or mark.

Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

cc: Office of Compliance Monitoring

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.19713-296
IDA'S SULFA-92

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

The eyewear requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Protective Eyewear". The exact location is shown in Section A and B on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

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.

Correct the typographical errors circled on your proposed label.

The eyewear requirement for early entry is missing, add "Protective Eyewear" to the PPE for early entry.

DREXEL
SULFA 92

FUNGICIDE AND INSECTICIDE

ACTIVE INGREDIENTS:

Sulfur 92.00%

INERT INGREDIENTS: 8.00%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN
CAUTION

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~~ ^{delete} contaminated clothing,
~~INCLUDING SHOES~~, and wash skin with soap and plenty of water.
If irritation develops, send for a physician.

EPA REGISTRATION NUMBER: 19713-296

EPA ESTABLISHMENT NUMBER:

NET CONTENTS:

MANUFACTURED BY: DREXEL CHEMICAL COMPANY
PO BOX 9306
MEMPHIS, TN 38109

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 14 1994

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

19713-296

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. Wash thoroughly with soap. Remove contaminated clothing. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.~~

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 contaminate water when disposing of rinsate or equipment wash water.

PHYSICAL HAZARDS: Keep away from heat, sparks, or 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.

RE-ENTRY-AND-FARM-WORKER-SAFETY-STATEMENTS

"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-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."

) Oral-warnings-must-be-given-if-there-is-reason-to-believe-that written-warnings-cannot-be-understood-by-workers.--"CAUTION: Area-treated-with-sulfur-on-(date-of-application).--Do-not-enter without-appropriate-protective-clothing-for-24-hours.--In-case-of accidental-exposure,-flush-eyes-or-skin-with-plenty-of-water. Call-physician-if-irritation-persists.--remove-and-wash contaminated-clothing-before-reuse."

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

MIXING INSTRUCTIONS: - Pour recommended amount of this material into 1/3 filled spray tank. Add balance of water to fill tank. Keep agitator running during filling and spraying operations. Do not allow mixture to stand. Do not use in low volume gear-type spray equipment.

WATER VOLUME: Use designated amount of product in the following gallons of water per acre.

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:** 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 higher rates when using dilute applications.

Use lower recommended rate when using concentrate equipment.

CHEMIGATION: DO NOT APPLY this product through any type of irrigation system.

CONSULT WITH STATE AGRICULTURAL EXPERIMENT STATION OR STATE AGRICULTURAL EXTENSION SERVICE PERSONNEL FOR ADDITIONAL INFORMATION CONSISTENT WITH LABEL CAUTIONS AND DIRECTIONS.

COMPATIBILITY: Sulfa 92 is compatible with most pesticides. Because conditions vary, a small amount of the pesticide should be mixed prior to application to examine their compatibility. ALWAYS ADD THE PESTICIDE TO THE MIXED SULFA 92.

NOTES:

Sulfur will cause severe fruit and leaf injury to sulfur sensitive crops. Do not allow this material to drift onto sulfur sensitive melons, squash, cucumbers, apricots or other plants which might be injured by sulfur.

When growing crops for processing, consult processor before applying sulfur.

Do Not Use within 2 weeks of an oil spray treatment; for citrus within 21 days.

Do not apply when shade temperatures exceed or are likely to exceed 90° F. Sulfur may burn foliage and fruit during periods of high temperatures and under certain climatic conditions.

RECOMMENDATIONS FOR USE:

ALFALFA: For the control of Lygus, Pacific Mite and Strawberry Mite, use 10 - 20 lbs. per acre. Repeat at 1 - 2 week intervals.

ALMONDS: For suppression of Brown Almond, European Red, Two-Spotted, Pacific and Strawberry Mites; apply 3 - 5 lbs. per acre. Apply 5 weeks after petal fall. Do not apply within 14 days of an oil application.

APPLES: SCAB AND POWDERY MILDEW: Apply 4 - 5 lbs. per acre. Apply from pink or pre-blossom spray through second cover spray. Add one gallon lime sulfur in pink and calyx sprays. Use on sulfur tolerant varieties only: MacIntosh, Golden Delicious, Jonathan and certain other varieties may be injured by sulfur under certain climatic conditions.

ASPARAGUS: For control of Rust, use 15 to 35 lbs. per acre. Apply after cutting stops, irrigate, cultivate, then apply the sulfur. Repeat at 7 to 10 day intervals through the season. For Rust control during Fern period, apply at 2 to 3 week intervals or with the regularly scheduled insect program. For suppression of Two-Spotted and Brown Mites, apply 6 to 8 lbs. per acre. Apply when pest first appears and repeat as necessary.

BEANS AND PEAS: Spider Mite and Powdery Mildew: apply 6 to 10 lbs. per acre. white Mold; apply 10 to 20 lbs. per acre. Sulfur may injure certain varieties of beans. Begin application when pest first appears and repeat as necessary.

CARROTS, ONIONS, AND GARLIC: Petrobia White and Powdery Mildew; apply 9 to 15 lbs. per acre when the disease first appears and repeat as needed.

CHERRIES: Blossom Blight, Brown Rot, Leaf Spot and Powdery Mildew; apply 4 to 6 lbs. per acre as a dilute spray or 15 to 20 lbs. per acre as an air or concentrate application. begin in popcorn stage. Repeat at bloom, petal fall and in cover sprays at 7 to 14 day intervals and as a post harvest foliar treatment for Leaf Spot.

CORN, SMALL GRAINS (Barley, Oats, Wheat, Rye), SORGHUM AND SOYBEANS: For suppression of the Two Spotted, Grass Banks and Pacific Mites; for control of the Atlantic Mite; (small grain only) for control of Powdery Mildew; apply 6 to 15 lbs. per acre. Apply when disease first appears and repeat as necessary, or with the regularly scheduled insect program.

COTTON: Spider and Strawberry (Atlantic) Mites; apply 2 to 10 lbs. per acre. Lygus; apply 10 to 15 lbs. per acre. Begin when infestation first occurs and repeat at 1 to 2 week intervals as necessary or with regularly scheduled insecticide program.

CITRUS: For suppression of Six Spotted, Citrus, Citrus Flat and Yuma spider Mites apply 4 to 30 lbs. per acre. Apply at bloom or early petal fall. Repeat as necessary.

GRAPES: Powdery Mildew apply 3 to 5 lbs. per acre. Apply when shoots are 6 inches long, repeat before blossoms open and continue as necessary. Concord and other labrusca type grapes may be injured by sulfur.

MELONS: Use 20 to 25 lbs. per acre to control Powdery Mildew. Powdery Mildew may be controlled by sulfur, but the sulfur often injures the vines, particularly if the temperature reaches 95° F. Treat when the disease first appears. Repeat as necessary. DO NOT USE ON SULFUR SENSITIVE VARIETIES.

PEACHES AND NECTARINES: Brown rot, Coryneum Blight, Rust, Peach Silver Mite, Powdery Mildew; apply 15 to 30 lbs. per acre. Begin in pink bud stage and repeat at bloom, petal fall and in cover sprays at 7 to 14 day intervals. Apply up to harvest on Peaches. Do Not apply after jacket stage on Nectarines. For Brown Rot (Peaches Only) control in summer sprays, apply 6 lbs. per 100 gallons of water, or 15 to 20 lbs. per acre. Begin application about 4 to 5 weeks before harvest and continue at weekly intervals.

PEANUTS: For control of Rust; apply 3 to 12 lbs. per acre. Start in early leaf stage. repeat applications as necessary, usually 10 to 24 days.

PEARS: Scab, Powdery Mildew; apply 20 to 30 lbs. per acre. Apply in the pink or pre-blossom spray. On Bartlett Pears apply 4 to 6 lbs. at petal fall through second cover sprays. Sensitive varieties (Anjou and Comice) under certain climatic conditions may be injured by sulfur.

PLUMS, PRUNES: Brown Rot, Prune Rust; apply 20 to 25 lbs. per acre at bloom or early petal fall. Repeat as necessary.

POTATOES: Powdery Mildew and Two Spotted Spider Mites; apply 6 to 10 lbs. per acre. Apply when disease first appears. Repeat applications at 3 to 4 week intervals or as necessary.

STRAWBERRIES, RASPBERRIES AND BOYSENBERRIES: Powdery Mildew; apply 4 to 10 lbs. per acre. Begin at first sign of disease and repeat as necessary. Discontinue applications during hot weather. Sulfur may injure strawberries under certain climatic conditions. DO NOT Use on sulfur sensitive varieties.

SUGAR BEETS: For control of Powdery Mildew apply 6 to 12 lbs. per acre. Begin at first sign of disease. Use lower rates for light disease pressure or as a preventative treatment. Repeat applications at 3 to 4 week intervals or as necessary.

TOMATOES: For control of Tomato Russet Mite use 15 to 30 lbs. per acre. Begin when infestation first occurs and repeat as necessary or with the regularly scheduled insect program.

ORNAMENTALS:

ROSES: Black Spot, Powdery Mildew, Rust; apply 3 tablespoons per gallon (6 lbs. per 100 gallons) and spray for full coverage wetting both sides of leaves. Begin applications when new growth appears in the spring and repeat every 7 days if necessary.

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 suitable containers 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: 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 chemical snot 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 Chemical Company 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.