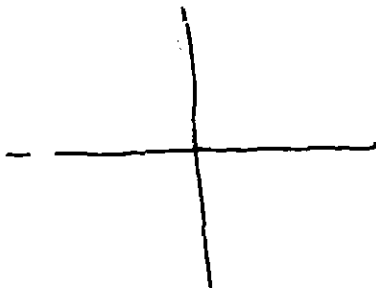


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 7 1989

Ms. Lou Shockey
 Ida, Inc.
 2215 West Street, 2nd Floor
 Germantown, TN 38139



Dear Ms. Shockey:

Subject: Alternate Formulations - Amended Labeling - New Uses
 Ida, Inc. Sulfur 9
 EPA Registration No. 45115-50
 Your Submission Dated June 1, 1989
 Your Supplier's Submission Dated April 17, 1989

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. The label must be revised to include the new statement "Do not contaminate water when disposing of equipment washwaters." This should replace the old statement.
 - b. The label must be revised to comply with the provisions of PR Notice 87-1. Add a statement prohibiting application through any type of irrigation system or include the appropriate statement indicated in the PR Notice.
3. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

-2-

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

The subject alternate formulations are acceptable and have been included in the files for this product.

Sincerely yours,

SL

Susan Lewis
Acting Product Manager (21)
Fungicide-Herbicide Branch
Registration Division (R7505C)

Enclosure



ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 07 1989

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

45115-50

SULFUR 8

A Flowable 8 Pound Elemental Sulfur

ACTIVE INGREDIENT:		
Elemental Sulfur	65.00%
INERT INGREDIENTS:	<u>35.00%</u>
	TOTAL	100.00%

Product contains 8.0 lbs. of sulfur per gallon.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Page One for Statement of Practical Treatment and additional
Precautionary Statements.

Manufactured For: Ida, Inc.

2215 West Street, 2nd Floor

Germantown, TN 38138

(901) 757-8056

Telex 823019

EPA Reg. No. 45115-50

EPA Est. No.

Net Contents: Gallons

Liters

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.

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.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. 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. 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 FARMWORKER SAFETY STATEMENTS

DO NOT enter treated area without protective clothing until sprays have dried.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

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. Oral warnings must inform workers of areas or fields that may not be entered without specific protective clothing until sprays have dried, and appropriate actions to take in case of accidental exposure, as described under the Precautionary Statements on this label. 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. "CAUTION--Area treated with SULFUR on (date of application). DO NOT enter without appropriate protective clothing until sprays have dried. In case of accidental exposure, flush eyes or skin with plenty of water. Call physician if irritation persists. Remove and wash contaminated clothing before re-use."

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 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 RATES WHEN USING CONCENTRATE EQUIPMENT. USE HIGHER RATES WHEN USING DILUTE APPLICATIONS.

APPLE, PEAR

Scab: Prebloom through calyx sprays $2\frac{1}{2}$ to $5\frac{1}{2}$ cups. Cover sprays $\frac{3}{4}$ to $1\frac{1}{2}$ pints. Powdery mildew: Prebloom through calyx sprays $2\frac{1}{2}$ to $5\frac{1}{2}$ cups. Cover sprays $1\frac{1}{2}$ pints.

PEACH

Brown rot, powdery mildew, Scab: Pink and bloom sprays $2\frac{1}{2}$ to $5\frac{1}{2}$ cups. Petal fall, shuck and cover sprays $\frac{3}{4}$ to $1\frac{1}{3}$ pints.

PEACH-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 $2\frac{1}{2}$ to $5\frac{1}{2}$ cups. Petal, shuck and cover sprays $\frac{1}{2}$ to $1\frac{1}{3}$ pints.

CHERRIES, PLUMS, PRUNES-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: $\frac{3}{4}$ to 3 pints. Do not apply within 4 weeks of an oil application. NOTE: Apply sprays November thru May.

PEANUTS

Rust: Apply $1\frac{1}{2}$ 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: $1\frac{1}{2}$ pints for early season control and up to 6 pints for mid to late season control.

GRAPES

(California only) - Powdery mildew: $\frac{3}{4}$ to $1\frac{1}{2}$ 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 $2\frac{1}{2}$ 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 1/2 pints in 5 to 8 gallons water per acre by air. Apply at first sign on 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.

TOMATOES-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:

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 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 IDA, INC. 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 IDA, INC. and is accepted as such by the Buyer.