



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

JUN 9 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

LISA J. STRONG
PLANT HEALTH TECHNOLOGIES
BOX 15057
BOISE, ID 83715

Subject: Label Amendment Submission of 4/18/94 In Response to PR Notice 93-7
EPA Reg. No. 65343-1
SUPER SIX LIQUID SULFUR

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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Printed with Soy/Carbolic 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.

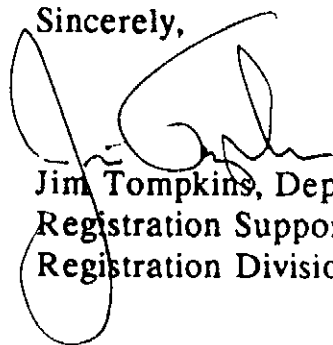
Submit the final printed labeling via the U.S. Postal Service to:

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", is written over a circular stamp. The signature is fluid and cursive.

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

Lisa J. Strong
PLANT HEALTH TECHNOLOGIES
BOX 15057
BOISE ID 83715

Comment for: EPA Reg Nr.65343-1
SUPER SIX LIQUID SULFUR

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.

The eyewear requirement for early entry in the Agricultural
Use Requirements Box on your proposed labeling is missing or
incorrect. Remove the incorrect requirement (if any) and
add "Protective eyewear". The exact location is shown in
Sections F and G on Part 2 of the Product Worksheet in
Supplement Three-A to PR Notice 93-7.

Correct the typographical errors circled on your proposed
label.

BEST COPY AVAILABLE

Super Six

Liquid Sulfur

ACTIVE INGREDIENT:

Sulfur as S..... 52.0%

INERT INGREDIENTS:..... 48.0%

TOTAL..... 100.0%

THIS PRODUCT CONTAINS 6 LBS. OF SULFUR PER GALLON.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 to 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

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

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

ph
PLANT HEALTH TECHNOLOGIES
P.O. BOX 15057, BOISE, ID 83715

with COMMENTS
In EPA Letter Dated

JUN 9 1994 REG. NO. 65343-1

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

65343-1

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Precautionary Statements: Harmful if swallowed, absorbed through the skin, or inhaled. Avoid contact with skin, eyes or clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

PERSONAL PROTECTIVE EQUIPMENT

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

Users should:

- 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.

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 regulation.

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Use this product in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for 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 intervals. 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 (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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and 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 incinerate, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

PRODUCT INFORMATION

PLANT HEALTH TECHNOLOGIES SUPER SIX® Liquid Sulfur is a flowable sulfur formulation that may be applied as a ground or aerial application. Consult your State Agricultural Experiment Station or Extension Specialist for advice in selecting treatments from this label to best fit local conditions. Do not combine with emulsifiable liquids except on dormant sprays or delayed dormant spray applications.

USE ONLY ON CROPS LISTED AND ONLY AS SPECIFIED ON THIS LABEL. EXCEPT ON COTTON, do not apply when temperatures exceed or are likely to exceed 90°F. Do not use sulfur with oil or within 14 days of an oil spray (for citrus 21 days). Do not combine with emulsifiable liquids.

NOTE: Sulfur will cause severe fruit and leaf injury to sulfur-sensitive crops. Do not apply or allow to drift to apricots, d'Anjou and Comice pears, cranberries, cucurbits (cucumber, cantelopes, melons, squash), filberts, spinach, tung trees, walnuts or other sensitive plants. Sulfur may burn foliage and fruit during periods of high temperatures and under certain climate conditions.

SUPER SIX® Liquid Sulfur can be mixed and applied with liquid fertilizer or water.

GENERAL CHEMIGATION INSTRUCTIONS

Apply this product only through one or more of the following types of systems: sprinkler including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move irrigation system(s). Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

CHEMIGATION SYSTEMS CONNECTED TO PUBLIC WATER SYSTEMS

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. At an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

When mixing, fill nurse tank half full with water. Add SUPER SIX[®] Liquid Sulfur slowly to tank while hydraulic or mechanical agitation is operating and continue filling with water. Stickers, spreaders, insecticides, nutrients, etc., should be added last. If compatibility is in question, use the compatibility jar test before mixing a whole tank. Because of the wide variety of possible combinations which can be encountered, observe all cautions and limitations on the label of all products used in mixtures. **DO NOT STOP AGITATION WITH SULFUR IN SPRAY EQUIPMENT. SULFUR IS HIGHLY CORROSIVE, AND EQUIPMENT SHOULD BE CLEANED THOROUGHLY AFTER EACH DAY'S SPRAYING.**

SPRINKLER CHEMIGATION

The system must contain a functional check valve, vacuum relief valve, and low pressure drain approximately located on the irrigation pipeline to prevent water source contaminated from backflow.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

The pesticide injection pipeline must also contain a functional normally closed, solenoid-actuated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

When mixing, fill nurse tank half full with water. Add SUPER SIX[®] slowly to tank while hydraulic or mechanical agitation is operating and continue filling with water. Stickers, spreaders, insecticides, nutrients, etc., should be added last. If compatibility is in question, use the compatibility jar test before mixing a whole tank. Because of the wide variety of possible combinations which can be encountered, observe all cautions and limitations on the label of all products used in mixtures. **DO NOT STOP AGITATION WITH SULFUR IN SPRAY EQUIPMENT. SULFUR IS HIGHLY CORROSIVE, AND EQUIPMENT SHOULD BE CLEANED THOROUGHLY AFTER EACH DAY'S SPRAYING.**

DILUTION RATE: Minimum recommended spray volume (Gallons) per acre when applying SUPER SIX[®]

	Aerial	Dilute	Concentrate
Vegetables	3	20	—
Field Crops	3	20	—
Vines	5	150	50
Tree Crops	10	400	50
Citrus	10	800	100
			(50 Florida)

RECOMMENDATIONS

TREE FRUITS

This product may be applied by ground equipment, aircraft or sprinkler irrigation systems but must be applied in sufficient water to assure thorough coverage. Dosage rates are given as pints of SUPER SIX[®] Liquid Sulfur per acre for use in a thorough coverage spray. The total amount of SUPER SIX[®] Liquid Sulfur per acre should not exceed 4 gallons depending on the size of the trees. Because of variations in the types of spray equipment used, the size of trees and density of foliage, the potential for disease, and the severity of disease incidence, a range of low and high rates is listed. Use the high rates where conditions dictate.

Crop	Disease / Pest	Rate / Acre	Use Instructions
Apple & Pear	Powdery Mildew	6 to 14 pints	Use at pre-bloom through calyx sprays
		3 to 8 pints	Use as cover spray
		12 pints	Use at pre-bloom through calyx sprays
Cherry, Plum and Prune	Brown Rot and Leafspot	8 pints	Use as cover spray
		6 to 14 pints	Use as pink and bloom sprays
		2½ to 7 pints	Use at petal fall, shuck and cover sprays
Citrus	Rust Mite & Clover Mite	3 to 18 pints	Apply sprays November through May
	Thrips	8 to 16 pints	Use as an early spring treatment for the reduction of thrips population. Thorough spray coverage is essential. Make application after spring flush has made 2 to 4 inch growth. Repeat as necessary. Do not apply within 21 days of an oil application.
Peach and Nectarine	Powdery Mildew, Brown Rot and Scab	6 to 14 pints	Use as pink and bloom sprays. Application to mature nectarines may cause discoloration
		2½ to 7 pints	Use at petal fall, shuck and cover spray. Application to mature nectarines may cause discoloration.

FIELD AND VINE CROPS

The high rate should be used where conditions favor disease development or where the incidence of disease is high. Use shorter spray intervals when disease is severe.

Crop	Disease / Pest	Rate / Acre	Use Instructions
Beans (dry, colored or green snap, lima) (Except CA)	Powdery Mildew & Rust	4 to 8 pints	Use in sufficient water for thorough coverage. Begin application at the first sign of disease. Repeat at 7 to 14 day intervals to keep new growth protected
Cotton	Atlantic Mite	2 pints	For early season control
		8 pints	For mid to late season control
Grapes	Powdery Mildew	1 to 2 pints	Use in 100 gallons water, maximum of 8 pints SUPER SIX [®] Liquid Sulfur per acre in spring and summer. Make first application when shoots are 6 to 8 inches long, second when shoots are 12 to 15 inches long and third at about bloom stage. The timing, rate and number of applications will vary with local conditions. Consult State Agricultural Extension Service or State Agricultural Experiment Stations in your region for specific information. Follow the USE PRECAUTIONS given on this label.
Onions (Except CA)	Powdery Mildew	1½ to 2 pints	Use in sufficient water for thorough coverage. Begin application at the first sign of disease, repeat at 7 to 14 day intervals to protect new growth.
Peanuts	Rust	2 to 4 pints	Begin 40 to 60 days after planting. Use 7 to 14 day intervals as long as needed to control rust.
Potatoes	Powdery Mildew	3 to 4 pints	Use in no less than 8 gallons water per acre by air. Apply at the first sign of infection and repeat at 3 week intervals.
Sugar Beets	Powdery Mildew (West, Northwest, & Midwest)	8 pints	Apply in no less than 10 gallons of water by air or ground at first sign of infection. Repeat applications should be made at 10 to 30 day intervals or as necessary throughout the season. Under most disease conditions only one or two applications will be needed.
		8 to 16 pints	For sprinkler irrigation
Strawberries	Powdery Mildew	2 pints	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 canners' recommendations.
Tomatoes	Russet Mite	4 to 8 pints	Amount depends upon size of plants. Use full coverage sprays.

NOTICE OF WARRANTY

PLANT HEALTH TECHNOLOGIES warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of PLANT HEALTH TECHNOLOGIES. In no case shall PLANT HEALTH TECHNOLOGIES be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. PLANT HEALTH TECHNOLOGIES MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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