

70905-1

07-26-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Sulphur Mills, Ltd.
% Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 20124

JUL 26 2010

Subject: Cosavet DF
EPA Reg. No. 70905-1
Your amendment dated April 28, 2010
EPA Decision Number 426437

Dear Dr. Brooks:

The revised amended label referred to above, submitted April 27, 2010 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following changes are made:

1. On page 3 in the **AGRICULTURAL USE REQUIREMENTS** box delete "EXCEPTION: If the product is soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated."
2. On page 3 in the **STORAGE AND DISPOSAL BOX** in the line below the subheader **CONTAINER DISPOSAL** delete words "Nonrefillable container." that follow the colon.
3. On page 3 add the following text box immediately above the **STORAGE AND DISPOSAL** box:

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the WPS for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Keep unprotected persons and domestic animals out of the treated area until sprays have dried.

4. On page 3 change the last paragraph ("Pour the recommended....while spraying") to read:

"For tank mixtures: Do not mix with any product which contains a prohibition on tank mixing, and follow more restrictive labeling of any tank mix partner. Pour the specified amount of product into water and stir to make a thin slurry. Add slurry to tank when partially full before other materials are added. Add wetting agents last to avoid foaming. Keep spray mixture agitated while spraying."

5. On page 4 in the section **DIRECTIONS FOR DILUTION - AERIAL APPLICATION** change the last sentence from "Orchard rates...per acre." to "Do not make applications to orchards using less than 10 gallons of water per acre."
6. On page 5 under **CUCURBITS** fix the formatting of the paragraph.
7. On page 5 under **GRAPES** change "...14day...." to "...14 day...."
8. On page 7 under **ORNAMENTALS** change to read "**(Ground Application)** Apply 3 to 5 lbs in 100 gallons of water per acre...."
9. On page 7 under **TURFGRASS** change "Apply 3 to 10 lbs per acre." to "Ground Application: Apply 3 to 10 lbs per acre in 20 to 60 gallons of water."

One copy of the label stamped "Accepted with Comments" is enclosed for your records. This label supersedes all labels previously accepted for this product. Please submit one copy of the final printed label before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at westin.robert@epa.gov.

Sincerely,



Mary L. Waller
Product Manager (21)
Fungicide Branch
Registration Division (7504P)

Enclosure

SULPHUR MILLS
COSAVET DF®
Fungicide - Miticide

OMRI™
Listed

ACTIVE INGREDIENT:	BY WT.
Sulfur*	80.0%
OTHER INGREDIENTS:	20.0%
TOTAL	100.0%

*CAS No. 7704-34-9

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	

Manufactured by:
SULPHUR MILLS LIMITED
604/605, 349 Business Point
Western Express Highway,
Andheri (E), Mumbai ,
India 400 069

ACCEPTED
with **COMMENTS**
In EPA Letter Dated

JUL 26 2010

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

70905-1

EPA Reg. No. 70905-1

EPA Est. No. 70905-IND-1

Batch No. _____

NET WEIGHT ___ LBS ___ KG

For 24-Hour Emergency Information, contact CHEMTREC (1-800-424-9300)

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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 enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours. **EXCEPTION:** If the product is soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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, chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride, shoes plus socks and protective eyewear.

STORAGE AND DISPOSAL

Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.

PESTICIDE STORAGE: Store in a cool place. Protect from excessive heat. Store product in original container only way from water, food, or feed. Keep container closed to prevent spills and contamination. Carefully open containers. After partial use, replace lid and close tightly. Do not put concentrate or diluted product into food or drink containers.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by disposal. Improper disposal of excess pesticide, pesticide spray, or rinsate is a violation of Federal law. Wastes resulting from the use of this product that cannot be used according to the label instructions or chemically reprocessed may be disposed of on site or at a landfill or waste disposal facility approved for pesticide disposal, or in accordance with all applicable Federal, state, or local regulations. For further guidance, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Empty containers retain vapor and product residues.

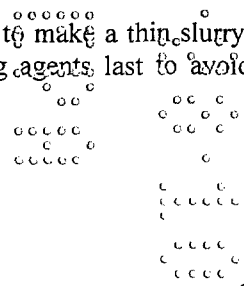
Nonrefillable Container (flexible-bag-all weights): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

FOR 24-HOUR EMERGENCY ASSISTANCE (SPILL, LEAK OR FIRE), CALL INFOTRAC AT (800) 535-5053.

GENERAL INFORMATION

Sulfur may cause severe fruit and foliage injury to certain crops. Sulfur sensitive plants include D'Anjou and Comice pears, apricots, cranberries, certain varieties of cucurbits, filberts, spinach, tung walnuts, and certain ornamentals. Apples, pears and strawberries are susceptible to foliage burn with sulfur under certain climatic conditions. Sulfur may burn foliage when temperature is high. Do not apply if temperatures during or within 3 days after application are expected to exceed 90° F. Do not use within 2 weeks of an oil spray treatment except for dormant, delayed dormant or postharvest applications with a suitable spray oil. **For citrus, do not apply within 21 days of an oil spray.** When growing crops for processing, consult the processor before applying sulfur.

Pour the recommended amount for the specific spray problem into water and stir to make a thin slurry. Add to tank when part full and before other materials are added. Add wetting agents last to avoid foaming. Keep spray mixture agitated while spraying.



Apply to crops as needed in season when mites or diseases first appear and when insect buildup and plant disease damage are imminent. Repeat as directed. Use the lower rate when disease or insect pressure is low. Use the higher rate when disease or insect pressure is severe.

DIRECTIONS FOR DILUTION

DILUTE APPLICATION: Ground application: Apply specified rate in 20-60 gallons of water per acre. **Orchard application:** Apply specified rates in 100-800 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 20-100 gallons of water per acre. Special concentrate equipment is necessary for these uses.

AERIAL APPLICATION: Apply specified rate in 3-20 gallons of water per acre. Orchard rates should not be applied in less than 10 gallons of water per acre.

CROP USE DIRECTIONS

ALFALFA: Atlantic Mite, Red Spider Mite. Apply 12 to 25 lbs per acre throughout season as necessary.

ALMONDS, CHERRIES, NECTARINES, PEACHES, PLUMS, PRUNES: Powdery Mildew, Brown Rot, Leaf Spot, Silver Mite, Flat Mite, Red Spider Mite. Apply 10 to 20 lbs per acre. For Brown Rot, spray when fruits start ripening. For remaining pests and diseases, apply at bloom or early petal fall and repeat as necessary, usually 10-14 days or after a period of wet weather.

APPLES, PEARS, QUINCE: pre-bloom and petal fall: Powdery Mildew, Scab, Blister Mite, Red Spider Mite, Pear Psylla. Apply 10 to 20 lbs per acre. Apply with cover sprays throughout the season. Do not apply to d'Anjou pears.

APPLES, PEARS: dormant, delayed dormant, or postharvest: Pear Psylla, Blister Mite, Two-Spotted Mite, Red Spider Mite. Apply 10-20 lbs per acre with a suitable spray oil postharvest and during the dormant periods of bud development. Do not apply to sensitive varieties of pears except at these stages.

ARTICHOKES: Leaf Spot. Apply 10-20 lbs per acre. Begin at first sign of disease and repeat applications at a 7-10 day interval.

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

AVOCADOS: Brown Mite. Apply 10 to 30 lbs per acre when mites are first noticed and as needed thereafter.

BANANAS: Mites. Apply 10-30 lbs per acre. Begin applications at first sign of disease and reapply as needed.

BARLEY, CORN, OATS, RYE, SORGHUM, WHEAT: For suppression of Red Spider Mite, Two Spotted Mite, Grass Banks Mite, Pacific Mite and for control of Atlantic Mite (Small Grains only). Apply 6 to 15 lbs per acre when insect pressure is imminent and repeat spray as necessary or apply with the regularly scheduled pest control program.

BEANS, PEAS: Powdery Mildew, Rust, Red Spider Mite. Apply 3 to 10 lbs per acre. Start in early leaf stage. Repeat application every 10-14 days with or without pesticides immediately after a rain.

BROCCOLI, BRUSSELS SPROUTS, CABBAGE, CAULIFLOWER: Powdery Mildew, Rust, Red Spider Mite. Apply 3 to 5 lbs per acre starting in early leaf stage. Repeat applications every 10-14 days with or without pesticides immediately after a rain.

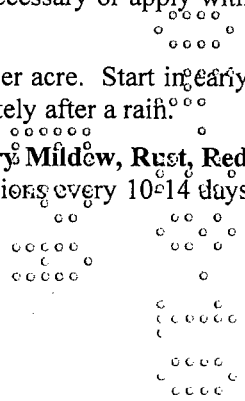


TABLE BEETS: Powdery Mildew, Red Spider Mite. Apply 3-5 lbs per acre as soon as symptoms appear and repeat every 2 to 3 weeks as necessary.

TOMATOES: Russet Mite, Powdery Mildew. Apply 3-10 lbs per acre at onset of symptoms. Thorough coverage is required.

TURNIPS: Powdery Mildew, Red Spider Mite. Apply 3 to 5 lbs per acre at the early leaf stage and repeat every 14 days as needed.

WALNUTS, MACADAMIA NUTS (Hawaii): Pacific Mite, Almond Mite, Two-Spotted Mite. Apply 10-20 lbs per acre throughout the season as needed. Certain varieties of walnuts are sensitive to sulfur sprays under certain conditions. Do not apply unless the varieties are known to be tolerant to sulfur in your area.

ORNAMENTALS: (Ground Application) Apply 3 to 5 lbs in 100 gals of water. **(Aerial Application)** Apply 3 to 20 lbs per acre in a minimum of 10 gals of water per acre. Ensure complete plant coverage. Begin when disease first appears and repeat at a 5 to 10 day interval.

Asters, Carnations: For control of Powdery Mildew.

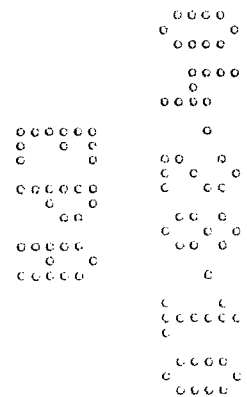
Calendula, Cherry Laurels, Chrysanthemum, Hollyhock, Smilax: For control of Leaf Spot and Powdery Mildew.

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.

TURFGRASS (Commercial turf and grass including golf courses, parks, athletic fields, sod farms) **Fusarium Patch (suppression), Powdery Mildew, Rust, Take-All (suppression).** Apply 3 to 10 lbs per acre. Make applications at the first sign of disease or when climatic conditions favor disease development. Repeat applications as needed. Tank mixes with systemic fungicides will improve control and aid in prevention resistance from developing.



CHEMIGATION APPLICATION

General Instructions: Only apply Cosavet DF[®] through sprinkler irrigation systems including center pivot, lateral move, end tow, side (wheel) roll, traveler, big gun, solid set, or hand move irrigation systems. Do not apply this product through any other type of irrigation system. Uneven distribution of treated irrigation water can result in crop injury or lack of effectiveness. Do not apply when wind speed favors drift beyond the area intended for treatment.

Contact State Extension Service Specialists, equipment manufacturers, or other experts if you have any questions about calibration. 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.

Do not connect the chemigation system to any public water system. A public water system means any system for 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.

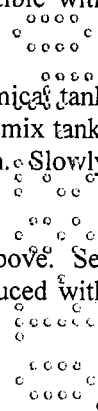
Cosavet DF may be applied in conjunction with chemically neutral liquid fertilizers. Application in conjunction with highly alkaline fertilizers, such as aqueous ammonia, may cause pesticide degradation, resulting in reduced performance, and should be avoided.

System Requirements: Systems utilizing a pressurized water and pesticide injection system must meet the following requirements:

- The system must contain a functional check valve, vacuum relieve valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination 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 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 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.

Spray Preparation: Remove scale, pesticide residues, and other foreign matter from the chemical tank and entire injector system. Flush with clean water. Prepare a suspension of Cosavet DF[®] in a mix tank. Fill the tank with 1/2 to 3/4 the desired amount of water. Start mechanical or hydraulic agitation. Slowly add the required amount of Cosavet DF[®] and then the remaining volume of water.

Sprinkler Irrigation: Follow the requirements in the System Requirements section above. Set sprinkler system to deliver 0.1 – 1.25 inches of water per acre. Efficacy may be reduced with



higher volumes of water. Start sprinkler and uniformly inject the suspension of Cosavet DF[®] into the irrigation water line so as to deliver the desired rate per acre. The suspension of Cosavet DF[®] should be injected with a positive displacement pump into the main line ahead of the right angle turn to ensure adequate mixing. When treatment with Cosavet DF[®] has been completed, do not irrigate the treated area for 24 to 48 hours to prevent washing the chemical off the crop. Where sprinkler distribution patterns do not overlap sufficiently, unacceptable pest control may result. Check local restrictions and requirements regarding sprinkler applications, as they may vary from state to state.

Application Instructions: Follow the requirements in the System Requirements section above. Apply Cosavet DF[®] only through systems containing anti-siphon and check valves designed to prevent water source contamination or overflow of the mix tank and containing interlocking controls between the metering device and the water pump to ensure simultaneous shutoff. Maintain a gentle continuous agitation in mix tank during mixing and application to ensure a uniform suspension.

Injecting a larger volume of a more dilute suspension per unit of time will provide greater accuracy in calibration and distribution. Application of more than recommended quantities of irrigation water per acre may result in decreased product performance.

Do not apply when wind speed favors drift, when system connections or fittings leak, when nozzles do not provide uniform distribution or when lines containing the product cannot be flushed and must be dismantled and drained. In a center pivot system, block the nozzle set nearest the well, pivot, or injection unit to prevent spray being applied to this area. Allow sufficient time for pesticide to be flushed through all lines and all nozzles before turning off irrigation water.

NOTE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

COSAVET DF[®] is a registered trademark of **SULPHUR MILLS LTD.**
OMRI[™] is a trademark of the Organic Materials Review Institute.

