



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

14 JUN 1982

Mr. John Spinks
Chief, Office of Endangered Species
U.S. Department of the Interior
Washington, D.C. 20240

Dear Mr. Spinks

This letter confirms Bill Rabert's conversation with Earl Possert of your staff regarding the proposed registration of Counter 15G (terbufos) for use on grain sorghum and soybeans. Review of former Section 7 consultations indicated OES opinions for Thimet 20G, Carbofuran 10G, and Temik 10G, which cover one or both of these two uses. Since Thimet and Counter are almost structurally identical, their toxicity to all species are similar, and their formulation and use patterns are similar, EEB has concluded that the same geographic label restrictions should apply. It should be noted that Counter 15G was previously registered on corn prior to the initiation of EOS consultations and therefore some restrictions may relate to those corn uses as identified in the Thimet opinion. The existing Environmental Hazards statement for Counter 15G is:

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Treated granules exposed on the soil surface may be hazardous to birds and other wildlife. Keep out of any body of water. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of waste.

Current use directions direct the applicator to "Cover granules that may be exposed on the ends of the treated row and turns and loading areas by deep discing immediately after treating fields."

Along with these instructions, EEB suggests the following geographic restrictions prohibiting the use of Counter 15G. Since some inconsistencies were found in the Texas counties listed for Attwater's greater prairie chicken, the number of listed counties were reduced from 13 to the original 9 counties identified in the OES biological opinion for carbofuran to maintain consistency with earlier labeling requirements for sorghum (see attached memo). The proposed restriction is:

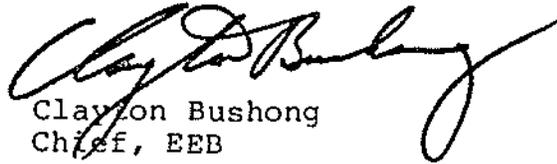
"Use of terbufos should be prohibited in the Texas counties of Aransas, Austin, Brazoria, Colorado, Goliad, Harris, Refugio,

2 pp
and
4 pp attachment

Victoria, and Waller to protect the Attwater's greater prairie chicken, and in the California counties of Butte, Colusa, Glenn, Solano, Sutter, and Yolo from mid-August through the end of December and from mid-September through mid-March in the counties of Merced, San Joaquin, and Stanislaus to protect the Aleutian Canada goose which were both identified by OES as being in jeopardy; and EOS suggested that terbufos use should be withheld from Lauderdale County, Alabama to protect the Alabama cavefish and in the Maryland counties of Dorchester, Kent, Queen Anne, and Talbot and in Accomack County, Virginia to protect the Delmarva Peninsula fox squirrel, until the potential impact on these two species is clarified."

EEB requests your concurrence on this action. Thank you.

Sincerely yours,



Clayton Bushong
Chief, EEB

Attachment

ADDENDUM TO PEER GROUP'S REVIEW OF
THE TEMIK REVIEW FOR SORGHUM

TO: Clayton Bushong, Chief
Ecological Effects Branch
Hazard Evaluation Division

PEER GROUP:

MEETING DATE: 04/28/82
DATE OF REPORT: 05/04/82
REVIEWER: Charles Bowen

- 1. Mary Gessner *MG*
- 2. Dennis McLane
- 3. Doug Urban
- 4. Richard Stevens *RS*

The purpose of this addendum is to change the first of four recommendations made by the group concerning the review of Temik's use on sorghum. The first recommendation prohibited the use of Temik on sorghum in the following eleven Texas counties:

- | | |
|---------------|------------------|
| - 1. Refugio | ✓ 7. Wallen |
| - 2. Goliad | ✓ 8. Wharton |
| - 3. Austin | - ✓ 9. Fort Bend |
| - 4. Colorado | ✓ 10. DeWitt |
| - 5. Harris | - 11. Brazoria |
| - 6. Victoria | - 12. Aransas |
| | - 13. Galveston |

> Deleted because sorghum is not currently grown there.

However, Clayton Bushong, Branch Chief, pointed out that we should adhere to the original nine counties mentioned in the Office of Endangered Species (OES) biological opinion on carbofuran for sorghum in order to remain consistent. Omissions and additions will be entertained provided OES rationale is acceptable and stable.

The following is a list of the counties recommended in the carbofuran document:

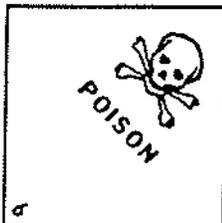
- | | |
|--------------|----------------|
| ✓ 1. Aransas | ✓ 5. Colorado |
| ✓ 2. Refugio | ✓ 6. Galveston |
| ✓ 3. Goliad | ✓ 7. Harris |
| ✓ 4. Austin | ✓ 8. Victoria |
| | ✓ 9. Brazoria |

ACCEPTED

MAY 13 1982

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 241-238

DOT-44D



DOT - E 624

Organic phosphorus compound, irritant, etc.

Counter[®] 15-G



SOIL INSECTICIDE-NEMATICIDE

FOR USE IN FIELD CORN, POPCORN, SWEET CORN AND SUGAR BEETS

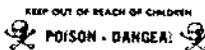


Active Ingredient:

Terbufos (S-[[(1,1-dimethylethyl)thio]methyl]O,O-diethyl) phosphorodithioate... 15.0%

Inert Ingredients 85.0%

EPA Reg. No. 241-238



MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN
RAPIDLY ABSORBED THROUGH SKIN
REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS,
PROGRESSIVELY INCREASE SUSCEPTIBILITY TO POISONING

See Back Panel For Antidote And Other Warnings



PELIGRO
AL USUARIO: Si usted no ve inglés, no use este producto hasta que se explique en otra vida especial de instrucciones
(TO THE USER: If you cannot read English, do not use this product until the label has been fully explained to you.)

Net Weight: 50 Lbs.
22.68 kg

24696-08

D-42

LOT NO. 365 840 38A1
TRADEMARK

SOLD BY
AMERICAN CYANAMID COMPANY
AGRICULTURAL DIVISION—WAYNE, N.J. 07470

MADE AND PRINTED IN U.S.A.

SOIL INSECTICIDE-NEMATICIDE
Counter[®] 15-G

Counter[®] 15-G
SOIL INSECTICIDE-NEMATICIDE

SUPPLEMENTAL LABELING

COUNTER® 15-G soil insecticide-nematicide
(EPA Reg. No. 241-238)

DIRECTIONS FOR USE

BEFORE USING, READ PRECAUTIONARY STATEMENTS ON BAG

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. COUNTER 15-G should be applied with a granular pesticide applicator properly calibrated to assure accurate placement and proper dosage. See label for specific instructions.

Cover granules that may be exposed on the ends of the treated rows and turns and loading areas by deep discing immediately after treating fields.

Crop	Pest Controlled	Rates	Application	Remarks
Grain Sorghum At planting	Greenbugs	<u>Banded</u> 8-16 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing)	<u>Banded</u> ^{1/} Place granules in a 5-7 inch band directly behind the planter shoe in front of the press wheel	Do not place granules in direct contact with seed as crop injury may occur. Only one application per year may be use
At bedding or At planting		<u>Knifed-in</u> 8-16 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 26 lbs. per acre.	<u>Knifed-in</u> Drill granules 1-4 inches directly below the seed OR 1-4 inches below the seed and up to 5 inches to the side of the seed.	^{1/} Do not use banded applications in New Mexico, West Texas and the Panhandle of Oklahoma.

Rec