

Revised Recommendations ¹²⁻¹⁹⁻⁷⁴
RMC

O,O-diethyl S-[t-butylthio]methyl phosphorodithioate
(PP4F1496, CL 42100, Counter 15G)

EPA File Symbol R41-ECI

PP4F1496 Submitted 5-1-74 Filed 5-23-74

American Cyanamid Co

1 Introduction

Applicant proposes registration of the above new insecticidal chemical for use against corn rootworms and wireworms with proposed negligible residue tolerance of 0.05 ppm of O,O-diethyl-S-t-butylthiomethylphosphorodithioate and its cholinesterase-inhibiting metabolites in or on corn fodder, forage, and grain. Proposed product name is Counter 15G Soil Insecticide.

Applicant intends to replace phorate (O,O-diethyl S-[(ethylthio)methyl]phosphorodithioate) with Counter. Note that Counter is t-butylthio while phorate is ethylthio.

5. Recommendations

A. Object to registration

1. There must be a caution on the label such as "Do not rotate in treated area for one year following application." ^{if} cover crops may be planted ^{in treated area} if plowed under and not grazed. Data as outline below are needed to continue registration.

1. Determine data on rotational crops to be used in the treated area using each labeled pesticide in registration.
 - a. For crops rotated in rotation for harvest of crop indicated on area. The pesticide is to be used in a sandy loam soil under aerobic conditions for about 100 days then a root crop, small grain and a vegetable crop. The root crop is required but crops in two other crop groupings may be used.
 - b. For crops rotated the following year after treatment, the pesticide is to be used in the soil for one year. Use crops as above.
 - c. If significant residues are found then actual field studies using non-labeled pesticide will be needed. This data is to be obtained under actual agricultural practice.
 - d. If residues are found in rotational crops then labeling restrictions will be needed. This restriction will be a time interval from application to a time when rotational crops can be planted and not result in the uptake of illegal residues in the rotational crops. A restriction can be no longer than 18 months.
 - e. Cover crops can be rotated if label restrictions are such that the cover crop is plowed under and not grazed.
 - f. If the agricultural practice is such that a treated crop area is rotated with another crop that will result in another treatment of the pesticide to the same area residue data will be needed on the rotational crop. The rotational crop is to be grown under actual use conditions.

Re comments
5.1 - No adverse environmental
chemistry comments
Object to registration for the following reasons

2. A complete review of the environmental chemistry data has not been made at this time. This is in connection with the fish accumulation study which will require further review.
- NOTE: Patritchlow - we are requesting criteria from C & E D

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