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241-238

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APR 9 1992

American Cyanamid Company
Agricultural Research Division
P.O. Box 400
Princeton, NJ 08540

BEST AVAILABL. COPY

Gentlemen:

Subject: Field Corn Supplemental Label
Counter 15 G
EPA Registration No. 241-238
Counter 20 CR Systemic Insecticide-Nematicide
EPA Registration No. 241-314
Your Application Dated February 25, 1992

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. The following comment is applicable to the Counter 15 G product labeling:
 - Since the current Beacon label specifically prohibits the application of terbufos at planting, before, or within 7 days after applying Beacon, your label reference to the application of Beacon following Counter 15 G applications at planting must be deleted.
 - b. The following comment is applicable to both the Counter 15 G and the Counter 20 CR product labeling:
 - Your placement of the statement regarding use of Counter after application of Beacon which appears in the directions for use on corn at planting is confusing since the Beacon label prohibits such use on corn at planting. Relocate this statement under the label directions for use on corn after plants have emerged, i.e., post-emergence or cultivation.

60227:I:Mautz:WP14-04:KEVRIC:04/06/92:05/06/92:aw:wo:dd:av

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

2. Submit two (2) copies of your final printed labeling before you release the product for shipment.

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 constitutes acceptance of these conditions.

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

It should be noted that the subject supplemental labeling which was submitted as a notification does not qualify as such. Future notifications of label changes that do not qualify as such will require resubmittal as an amendment as specified in 40 CFR 152.46.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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RESTRICTED USE PESTICIDE

Due to acute oral and dermal toxicity

For retail sale to, and use only by Certified Applicators or persons under the direct supervision of a Certification Applicator, and only for those uses covered by the Certified Applicator's certification. American Cyanamid Company endorses Certification to promote the responsible use of pesticides to insure the protection of man and the environment.

EPA Reg. No. 241-238

DIRECTIONS FOR USE

BEFORE USING, READ PRECAUTIONARY STATEMENTS ON BAG LABEL

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. COUNTER 15G should be applied with a granular pesticide applicator properly calibrated to assure placement and proper dosage. See bag label for specific instructions. This label must be in the possession of the user at the time of the pesticide application.

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

<u>Crops</u>	<u>Pests Controlled</u>	<u>COUNTER15G Rates</u>	<u>Application</u>	<u>Remarks</u>
FIELD CORN, POPCORN AND SWEET CORN	Corn rootworms Wireworms White grubs Seedcorn maggots	Banded or In-furrow 8.0 oz. per 1,000 ft. of row for any row spacing.	Banded Place granules in a 7-inch band over the row, in front of or behind the presswheel and lightly incorporate.	For use on conventional and conservation tillage corn. In situations where crop debris or winds can prevent proper placement of granules, in-furrow applications are recommended. In-furrow applications reduce the potential for insecticide runoff resulting from excessive rain.
At Planting	Seedcorn beetles Corn flea beetles Maize billbugs Southern corn billbugs Thrips Symphylans	Do not exceed 9.7 pounds of COUNTER 15G per acre.	In-Furrow Place granules directly in the seed furrow behind the planter shoe.	Under dry soil conditions or heavy infestations, it may be necessary to apply an insecticide rescue treatment with another registered insecticide after corn emergence to control surviving cutworm larvae.
	Nematodes Lance Lesion Root knot Spiral Sumt Sting Stubby root Dagger			
	Suppression of: Curworms Lesser corn stalk borers			

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

APR - 9 1992

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

241-238


If application is made at
planting, do not make post-emer-
gence or cultivation time
treatments with COUNTER 15G

FOR FIELD CORN ONLY:

COUNTER 15G may be
applied 7 days after applica-
tions of Beacon herbicide.
Please refer to the at-
cultivation directions.

Use of Beacon herbicide
following COUNTER 15G
applications at planting may
result in severe crop injury.

¹Beacon is a registered trademark of Ciba Geigy Corporation.
²Registered trademark of American Cyanamid Company.

 **CYANAMID**
American Cyanamid Company
Agricultural Division
Crop Protection Chemicals Department
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