

FM 14 241-238

102415

JUN 2 - 1994

5446308 $\frac{300}{17}$

5449191 $\frac{300}{38}$

Mr. John J. Arthur
American Cyanamid Company
Agricultural Research Division
P.O. Box 400
Princeton, NJ 08543-0400

Dear Mr. Arthur:

Subject: Counter 15G Systemic Insecticide Nematicide
EPA Registration No. 241-238
Submissions dated July 22, 1993 and August 30, 1993

The labeling 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 revised labeling.

a. The Accent herbicide comment on your label needs to be removed or worded to be in accordance with the Accent label. The Accent herbicide label prohibits the use of Accent following treatment with Counter 15G (all applications). Your label states that damage may result if the products are used in sequence, implying use is not prohibited.

b. Revise the enclosed label to include the Worker Protection Standard requirements as accepted by the Agency with comments on February 24, 1994.

2. Submit one copy of your final printed labeling before you release the product for shipment.

*dmills/6/2/94/ c:\dmills
cyanamid/238.1*

20415

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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 bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosures

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

3045

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 Certified 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.

COUNTER® 15G
systemic insecticide nematocide

**FOR USE IN FIELD CORN, POPCORN, SWEET CORN, SUGAR BEETS,
AND GRAIN SORGHUM**

Active Ingredient:		
terbufos: S-[[[(1,1-dimethylethyl)thio]methyl] 0,0-diethyl phosphorodithioate.....	15.0%	
Inert Ingredients:.....	85.0%	
ACCEPTED with COMMENTS in EPA Letter Dated		
	Total	100.0%

JUN 2 1994

EPA Reg. No. 241-238

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

KEEP OUT OF REACH OF CHILDREN
DANGER/PELIGRO!
POISON



PELIGRO! PRECAUCION AL USUARIO: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING.

FIRST AID

If swallowed, drink one or two 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. Avoid alcohol. Get medical attention.

If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

If on skin, wash thoroughly with soap and water. Remove contaminated clothing and shoes. Wash clothing and decontaminate shoes before reuse.

If in eyes, immediately flush eyes with plenty of water. Get medical attention.

Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to poisoning.
Antidote: Atropine is an antidote.

BEST AVAILABLE COPY

4045

NOTE TO PHYSICIANS: Warning symptoms include weakness, headache, tightness in chest, blurred vision, nonreactive pinpoint pupils, salivation, nausea, vomiting, diarrhea, and abdominal cramps. Give atropine intramuscularly or intravenously, depending on severity of poisoning, 2 to 4 milligrams every 10 minutes until fully atropinized as shown by dilated pupils, dry flushed skin and tachycardia. Twenty to thirty milligrams, or more, may be required during the first 24 hours. Never give opiates or phenothiazine tranquilizers. Clear chest by postural drainage. Artificial respiration or oxygen administration may be necessary. Observe patient continuously for at least 48 hours. Allow no further exposure to any cholinesterase inhibitor until cholinesterase regeneration has taken place as determined by blood tests.

Pralidoxime chloride (2-PAM; PROTOPAM chloride) may be effective as an adjunct to atropine. Use according to label directions.

See Back Panel For Additional Precautionary Statements.

SOLD BY
American Cyanamid Company
Agricultural Products Division
Crop Protection Chemicals Department
Wayne, NJ 07470 1993

Net Weight: 50 lbs.
22.68 kg.

6/93

® Registered Trademark of American Cyanamid Company

BEST AVAILABLE COPY

5 of 15

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER!

Fatal if swallowed, inhaled, or absorbed through the skin. Do not breathe dust. Do not get in eyes, on skin, or on clothing.

In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water.

Do Not Breathe Dust

While emptying bags into equipment, pour downwind and allow as little free fall as possible. Do not pour at face level and do not allow dust to reach the breathing zone.

Do Not Contaminate Food or Feed Products

Once a bag has been opened, use it completely. Make sure the hoppers are emptied while still in the field. Refer to STORAGE AND DISPOSAL statement for further instructions.

Keep All Unprotected Persons Out of Operating Areas

Do not apply this product in such a manner as to directly or through drift expose workers or other persons.

Keep Out of Reach of Domestic Animals.

Not For Use or Storage In or Around the Home.

RE-ENTRY STATEMENT

Do not enter treated areas without protective clothing until treatments have been completed.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: DANGER. Area treated with COUNTER 15G on (date of application). Do not enter without protective clothing.

60915

WORK SAFETY RULES

REPEATED EXPOSURES TO CHOLINESTERASE INHIBITORS SUCH AS ARE CONTAINED IN THIS PRODUCT MAY, WITHOUT WARNING, CAUSE PROLONGED SENSITIVITY TO VERY SMALL DOSES OF ANY CHOLINESTERASE INHIBITOR.

Persons working with this product should have frequent blood tests of their cholinesterase levels. If the cholinesterase level falls below a critical point, no further exposure should be allowed until it has been determined by means of blood tests that the cholinesterase level has returned to normal. Before using this product, consult the National Pesticide Telecommunication Network for recommendations regarding such blood tests, poisoning management, emergency treatment, and other information regarding the toxicity of terbufos. The toll-free number for the National Pesticide Telecommunication Network is 1-800-858-7378.

If handled indoors, provide mechanical exhaust ventilation.

Keep all unprotected person, children, livestock, and pets away from treated areas or where there is danger of drift.

Do not rub eyes or mouth with hands. If you feel sick in any way, STOP work and get help right away. See First Aid section.

WEAR THE FOLLOWING PROTECTIVE CLOTHING DURING LOADING, APPLICATION, EQUIPMENT REPAIR, EQUIPMENT CLEANING, AND DISPOSAL OF THE PESTICIDE.

Wear a protective suit of one or two pieces that covers all parts of the body except the head, hands and feet. Wear chemical-resistant gloves and chemical-resistant shoes, shoe coverings, or boots. Wear goggles and a pesticide respirator approved by the National Institute for Occupational Safety and Health (NIOSH) and the Mine Safety and Health Administration (MSHA) at all times except during application.

If application is performed using an enclosed cab or cockpit, the following protective clothing may be worn as an alternate: long-sleeved shirt and long-legged pants; shoes and socks. Chemical-resistant gloves must be available in the cab or cockpit and must be worn while exiting. All other protective clothing required for use during application must be available in the cab and must be worn when exiting the cab into treated areas.

IMPORTANT! Before removing gloves, wash them with soap and water. Always wash hands, face, and arms with soap and water before smoking, drinking, or toileting.

IMMEDIATELY AFTER COMPLETING WORK WITH THE PESTICIDE, take off all clothing and shoes. Shower using soap and water. Do not reclothe with contaminated clothing and shoes. Wash protective clothing and protective equipment with soap and water after each use: destroy and replace gloves frequently. Respirators must be cleaned and filters replaced according to instructions included with the respirators. Personal clothing worn during use must be laundered separately from household articles. Clothing and protective equipment heavily contaminated with terbufos must be destroyed according to State and local regulations. HEAVILY CONTAMINATED CLOTHING (CLOTHING ON WHICH THE PRODUCT HAS SPILLED) CANNOT BE ADEQUATELY DECONTAMINATED.

BEST AVAILABLE COPY

70415

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and wildlife. Birds and wild mammals utilizing treated fields may be killed.

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff and drift from treated areas may be hazardous to aquatic organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwater. Cover or incorporate granules that are spilled during mixing and loading

IN CASE OF EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS PRODUCT CALL COLLECT, DAY OR NIGHT, AREA CODE 201-835-3100.

STORAGE AND DISPOSAL

Storage

Store pesticide products in a secure locked area where children, unauthorized persons and animals cannot enter. Do not store in the same area with food or feed. Do not store opened bags.

Prohibitions

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or Environmental Control Agency, or the hazardous waste representative at the nearest EPA Regional Office for guidance.

Container Disposal

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

General

Consult federal, state, or local disposal authorities for approved alternative procedures such as limited open burning.

BEST AVAILABLE COPY

DISCLAIMER

) The label instructions for the use of this product reflect the opinion of experts based on research and field use. The directions are believed to be reliable and should be followed carefully. However, 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 use of, or application of the product contrary to label instructions, all of which are beyond the control of American Cyanamid Company. All such risks shall be assumed by the user.

American Cyanamid Company shall not be responsible for losses or damages resulting from use of this product in any manner not set forth on this label. User assumes all risks associated with the use of this product in any manner not specifically set forth on this label.

American Cyanamid Company warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for the use therein described when used in accordance with the directions for use, subject to the risks referred to above. **CYANAMID DOES NOT MAKE OR AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED AND EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.**

) **BUYER'S EXCLUSIVE REMEDY AND AMERICAN CYANAMID'S EXCLUSIVE LIABILITY, WHETHER IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE OF COUNTER 15G.** In no case shall Cyanamid or the seller be liable for consequential, special or indirect damages resulting from the use or handling of this product.

) **BEST AVAILABLE COPY**

90415

DIRECTIONS FOR USE

) It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This label must be in the possession of the user at the time of pesticide application.

BEFORE USING, READ PRECAUTIONARY STATEMENTS

COUNTER 15G should be applied with a granular pesticide applicator properly calibrated to assure accurate placement and proper dosage. 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.

Crops	Pests Controlled	Rate of COUNTER 15G	Application	Remarks
FIELD CORN, POPCORN AND SWEET CORN At Planting	Corn rootworms Wireworms White grubs Seedcorn maggots Seedcorn beetles Corn flea beetles Maize billbugs Southern corn billbugs Thrips Symphylans	Banded or In-Furrow 8 oz. per 1,000 ft. of row for any row spacing. Do not exceed 8.7 pounds of COUNTER 15G per acre.	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.
	Nematodes: Lance Lesion Root knot Spiral Stunt Sting Stubby root Daggar Suppression of: Cutworms Lesser cornstalk borers		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. If application is made at planting, do not make post-emergence or cultivation time treatments of COUNTER 15G. Use of Accent* herbicide following COUNTER 15G applications may result in severe crop injury. Read and follow the directions on the Accent label before use.

NOT approved on Accent label

At Planting	In-Furrow	In-Furrow
For use in the states of Alabama, Florida, Georgia, Louisiana, Mississippi and Texas only.	Chinch bug 8 oz per 1000 ft. of row for any row spacing. Do not exceed 8.7 pounds of COUNTER 15G per acre.	Place granules directly in the seed furrow behind the planter shoe.

10/15

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
Post-emergence Incorporated (Same as crops above)	Maize billbugs Southern corn billbugs	Banded 8 oz. per 1,000 ft. of row for any row spacing. Do not exceed 8.7 pounds of COUNTER 15G per acre.	Apply in a 7-inch band over the row of seedling corn plants and lightly incorporate into the soil when billbugs or damage are observed, usually in the 1 to 6 leaf stage of growth. Use cultivators or other suitable implement to lightly incorporate granules into soil.	Only one at planting, post-emergence incorporated, or cultivation time treatment of COUNTER 15G may be used. Do not graze or cut for forage within 30 days of treatment. Consult your state experiment station, state extension service or certified pest management specialist for proper timing of application.
At Cultivation (Same as crops above)	Corn rootworms	8 oz. per 1,000 ft. of row for any row spacing. Do not exceed 8.7 pounds of COUNTER 15G per acre.	Apply granules to base of plants or over the top of plants just ahead of cultivation shovels so as to cover granules with soil.	Only one at planting, post-emergence incorporated or cultivation time treatment of COUNTER 15G may be used. For Field Corn Only: COUNTER 15G may be applied 7 days after application of Beacon** herbicide.
	European comborer	6 to 8 oz. per 1,000 ft. of row for any row spacing. Do not exceed 8.7 pounds of COUNTER 15G per acre.	Apply granules over the top of the plants just ahead of cultivation shovels so as to cover granules with soil.	American Cyanamid Company does not recommend using Beacon herbicide following use of COUNTER 15G at planting Do not graze or cut for forage within 30 days of treatment.

*Accepted supplier
10/15/93*

BEST AVAILABLE COPY

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
SUGAR BEETS At Planting	Sugar beet root maggots ¹ Sugar beet leafhopper ² Aphids ² Wireworms ¹ White Grubs ¹	Modified In-Furrow or Banded 4 to 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing).	Modified In-Furrow Apply in-furrow at planting time 2 to 3 inches behind the seed drop zone after some soil has covered the seed.	Only one application of COUNTER 15G per year may be made.
	Suppression of: Cutworms	Banded 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing)	Banded Apply in a 5 to 7-inch band over the row and lightly incorporate into the soil	At Planting Do not place granules in direct contact with the seed as crop injury may occur. Power incorporation may be used Do not incorporate deeper than 2 inches.
	Suppression of: Sugar beet cyst nematode Control of: Sugar Beet leafhopper Aphids	Knifed-in 18 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 29 lbs. of COUNTER 15G per acre.	Knifed-in Drill granules 2 inches to the side of the seed and 2 to 4 inches below the seed.	¹ If especially heavy infestations are expected use the 8 oz. rate. ² Modified in-furrow only at the 8 oz use rate.
SUGAR BEETS Post-emergence	Sugar beet root maggot	Banded 4 to 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing)	Banded Apply in a 5 to 7-inch band over the row and lightly incorporate into the soil	
	Aphids Sugar beet root aphid Sugar beet leafhopper	Banded 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing)		

BEST AVAILABLE COPY

2015

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
GRAIN SORGHUM		Knifed-in	Knifed-in	
	At Bedding Greenbugs Corn leaf aphids	8 to 16 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 26 lbs. of COUNTER 15G per acre.	Drill granules 1 to 4 inches directly below the seed OR 1 to 4 inches below the seed and up to 5 inches to the side of the seed.	Do not place granules in direct contact with seed as crop injury may occur.
GRAIN SORGHUM		Banded	Banded³	Only one application of COUNTER 15G per year may be used. ³ Do not use banded applications for aphid control in New Mexico, West Texas and the Panhandle of Oklahoma.
	At Planting Corn rootworms Wireworms White Grubs Nematodes Greenbugs Corn leaf aphids	8 oz. per 1,000 ft of row for any row spacing (minimum 20 inch row spacing) or no more than 13.1 lbs. of COUNTER 15G per acre	Place granules in a 5 to 7- inch band directly behind the planter shoe in front of the press wheel.	
		Knifed-in		
	Greenbugs Corn leaf aphids	8 to 16 oz. per 1,000 ft. of row spacing for any row spacing (minimum 20 inch row spacing) or no more than 26 lbs. of COUNTER 15G per acre.		

At Planting		Banded	Banded	Only one application of COUNTER 15G per year may be used.
For use in the states of Louisiana and Texas only.	Chinch bug	8 oz per 1000 ft. of row for any row spacing (minimum 20 inch row spacing).	Place granules in a 5 to 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. For early season control of light to moderate infestations.

* Accent is a registered trademark of E.I. duPont Nemours and Company
 ** Beacon is a registered trademark of Ciba Geigy Corporation

130715

Use Rates as Pounds per Acre*
(based on various row spacings and application rates)

Application Rates (Oz./1,000 Ft. of Row)

Row Width (inches)	4 oz.	6 oz.	8 oz.	10 oz.	12 oz.	14 oz.	16 oz.
40"	3.3	4.9	6.5	8.2	9.8	11.4	13.1
38"	3.4	5.2	6.9	8.6	10.3	12.0	13.7
36"	3.6	5.4	7.3	9.1	10.9	12.7	14.5
34"	3.9	5.6	7.7	9.7	11.6	13.5	15.4
32"	4.1	6.1	8.2	10.2	12.3	14.3	16.3
30"	4.4	6.5	8.7	10.9	13.1	15.2	17.4
28"	4.7	7.1	9.5	11.8	14.2	16.6	18.9
26"	5.0	7.6	10.2	12.7	15.3	17.9	20.4
24"	5.4	8.2	10.9	13.6	16.3	19.1	21.8
22"	5.9	8.9	11.9	14.9	17.9	21.0	24.0
20"	6.5	9.8	13.1	16.3	19.6	22.8	26.1

*See directions for specific use rates on each crop.

CALIBRATION INFORMATION

FIRST READ THE LABEL.

It is important that applicator equipment be properly set to deliver the labeled rate. This chart will help determine the desired rate of application.

When label is 8 ounces per 1,000 feet of row, use these suggested starting gauge settings, regardless of row spacing:

BEST AVAILABLE COPY

140915

PLANTING SPEED

APPLICATOR	3 mph	5 mph	7 mph
John Deere Max Emerge 2	16 (Models 7200 and 7300)	23	35
John Deere Max-Emerge	11 (Odd Notches 5-15-25-35) (Models 7000 and 7100)	15	19
John Deere Max-Emerge	13 (Even Notches 0-10-20-30) (Models 7000 and 7100)	15	25
John Deere 71 Flexi-Planter	1/28 (Metal Hoppers)	2/6	2/15
International Harvester	1/7.0	2/1.5	2/7.5
New International Harvester	1/9.0	2/6.0	3/2.0
Gandy	18	24	28
New Noble	8	12	16
Old Noble	11	17	23
Allis Chalmers (78 and 79 Series)	All Speeds - Gauge 7		
Allis Chalmers #385	10	14	18
Buffalo (Gauged)	9	15	20
Buffalo (Fluted-Roll Feed)	All Speeds-5 1/2 Revolutions Hexagonal nut		
White	Refer to Noble Settings		

NOTE: These settings should be used as starting points only. Continually check the amount of COUNTER used against a known length of row or acreage and make further adjustments accordingly. Also, check calibration occasionally to make sure equipment wear, changing moisture conditions, etc., have not caused a change in flow rate.

BEST AVAILABLE COPY

150415

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 Certified 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 FOR USE ON SUGAR BEETS

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 15G should be applied with a granular pesticide applicator properly calibrated to assure placement and proper dosage. See label for specific instructions. This label must be in the possession of the user at the time of 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.

Crop	Pests Controlled	Rate of COUNTER 15G	Application	Remarks
Sugar Beets At planting	Sugar beet leafhopper Aphids	Modified In-Furrow 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing).	Modified In-Furrow Apply in-furrow at planting time 2-3 inches behind the seed drop zone after some soil has covered the seed.	Only one application of COUNTER 15G per year may be made. At Planting:
Post emergence	Sugar beet leafhopper Aphids Sugar beet root aphid	Banded 8 oz. per 1,000 ft of row for any row spacing (minimum 20 inch row spacing).	Banded Apply in a 5-7 inch band over the row and lightly incorporate into the soil.	Do not place granules in direct contact with the seed as crop injury may occur. Power incorporation may be used. Do not incorporate deeper than 2 inches.

ACCEPTED
JUN 2 - 1994
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under
EPA Reg. No. 241-238
American Cyanamid Company

BEST AVAILABLE COPY