

PM 04

241-238

5-28-97

10414

Please read instructions on reverse before completing form.

Form Approved OMB No. 2070-0060. Approval expires 11-30-93

<b>(A)</b>  <b>EPA</b>	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <b>207969</b>
	<b>Application for Pesticide:</b>		
	<b>Section I</b>		

1. Company/Product Number <b>241-238</b>	2. EPA Product Manager <b>M. Mautz</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>COUNTER® 15G systemic insecticide nematocides</b>	PM# <b>Team 14</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>American Cyanamid Company Agricultural Products Research Division P. O. Box 400 Princeton, NJ 08543-0400</b> <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section II**

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below.

**NOTIFICATION**  
**MAY 28 1997**

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor changes per PR Notice 95-2. This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted.		If "Yes," Unit Package wgt.	No. per container	If "Yes," Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner In Which Label Is Affixed To Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other (_____)		

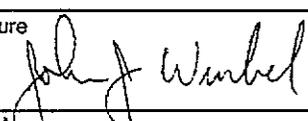
**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name <b>John J. Wrubel</b>	Title <b>Product Registrations Manager</b>	Telephone No. (Include Area Code) <b>609-716-2378</b>
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**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title <b>Product Registrations Manager</b>	6. Date Application Received (Stamped)
4. Typed Name <b>John J. Wrubel</b>	5. Date <b>4/17/97</b>	

2014

Proposed COUNTER® 15G Systemic Insecticide Nematicide Label Notifications.  
EPA Registration Number 241-238

Approved Label - 6/96 (PageNo.)	Proposed Full Label (Page No.)	Description of Change
1	1	Under the "COUNTER® 15G systemic insecticide nematicide" add "FIELD CORN GROWN FOR SEED" as follows "FOR USE IN FIELD CORN, FIELD CORN GROWN FOR SEED, POPCORN, SWEET CORN, SUGAR BEETS, AND GRAIN SORGHUM".
7	7	Under "Rates of COUNTER 15G" column for the At Planting treatment remove 6 oz per 1000ft row to the "First year corn" supplemental label.
7	7	Under the "Remarks" column, removed the "First Year Corn" use directions to a supplemental label.
8	8	Under "Rates of COUNTER 15G" column for the At Cultivation treatment remove 6 oz per 1000ft row to the "First year corn" supplemental label.
9	9	Under the "Remarks" column for SUGAR BEETS, added "Post Emergence: For sugar beet root maggot control apply at the time of first fly emergence" to assist the user.
11	11	In the Application Rates Table, a column for an 18 oz. Application rate was added to assist the user. An 18 oz application rate can be used for Suppression of Sugar beet cyst nematode and Control of Sugar beet leafhoppers and Aphids (page 9).

30/14

**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 nematicide

**FOR USE IN FIELD CORN, FIELD CORN GROWN FOR SEED, 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%
Total	100.0%

EPA Reg. No. 241-238

EPA Est. No. **NOTIFICATION**

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER! PELIGRO!**  
**POISON**

MAY 28 1997

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail).

**STATEMENT OF PRACTICAL TREATMENT**

**Organophosphate**

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

**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.

**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.

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### 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.

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

See back panel for additional precautionary statements.

American Cyanamid Company  
Agricultural Products Division  
Crop Protection Products Department  
Parsippany, NJ 07054 1997

Net Weight: 50 lbs.  
22.68 kg.

4/97

® Registered Trademark of American Cyanamid Company

97/15G/Bag

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4/97

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## 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.

#### 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 Out of Reach of Domestic Animals

#### Not for Use or Storage In or Around the Home

### 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 persons, 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 Statement of Practical Treatment section.

**Personal Protective Equipment (PPE):**

Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading
- A respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G)

Follow manufacturer's instructions for cleaning/maintaining Personal Protective Equipment. If no such instructions for washables, use detergent and hot water. Keep and wash Personal Protective Equipment separately from other laundry. Discard clothing and other absorbent materials that have become heavily contaminated with this product. Do not reuse them.

When handlers use closed systems or enclosed cabs, in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

**User Safety Recommendations:**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**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 washwaters. Cover or incorporate granules that are spilled during mixing and loading.

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

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, whether directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. This label must be in the possession of the user at the time of pesticide application.

### **AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and 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 48 hours. Each 48-hour REI is increased to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

Exception: if the product is soil-injected or 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 the involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls over long-sleeved shirt and long pants
- Waterproof gloves
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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## 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.

## 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 of 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.

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, FIELD CORN GROWN FOR SEED, POPCORN AND SWEET CORN  At Planting	Corn rootworms <sup>1</sup>	Banded or In-Furrow 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.	Banded	For use on conventional, conservation, or no till 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.  <del>*The 6-oz rate is recommended only for use on first-year corn.</del>  <sup>1</sup> COUNTER 15G controls all species of corn rootworms including southern, northern, western, and Mexican corn rootworms.  <sup>2</sup> For use in the states of Alabama, Florida, Georgia, Louisiana, Mississippi and Texas only for early season control of light to moderate infestations.  <sup>3</sup> 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 <sup>4</sup> larvae.  If application is made at planting, do not make post-emergence or cultivation time treatments of COUNTER 15G.
	Wireworms		Place granules in a 7-inch band over the row, in front of the presswheel and lightly incorporate with drag chains or tines.	
	White grubs		In-Furrow	
	Seedcorn maggots		Place granules directly in the seed furrow behind the planter shoe.	
	Seedcorn beetles			
	Corn flea beetles			
	Maize billbugs			
	Southern corn billbugs			
	Thrips			
	Symphylans			
	Chinchbugs <sup>2</sup>			
	Nematodes:			
	Lance			
	Lesion			
	Root knot			
Spiral				
Stunt				
Sting				
Stubby root				
Dagger				
Suppression of:				
Cutworms <sup>3</sup>				
Lesser cornstalk borers				

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
<b>Post-emergence Incorporated</b>  (Same as crops above)	Maize billbugs Southern corn billbugs	<b>Banded</b> 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 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.	<b>Only one at planting, post- emergence incorporated, or cultivation time treatment of COUNTER 15G may be used.</b>  Consult your state experiment station, state extension service or certified pest management specialist for proper timing of application.
<b>At Cultivation</b>  (Same as crops above)	Corn rootworms European cornborer	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 to base of plants or over the top of plants just ahead of cultivation shovels so as to cover granules with soil.	Do not graze or cut for forage within 30 days of treatment.  Do not harvest sweet corn within 60 days after application.  <b>For Field Corn Only:</b> (Excluding Field Corn Grown For Seed) COUNTER 15G may be applied 7 days after application of Beacon* herbicide.  American Cyanamid Company does not recommend using Beacon herbicide following use of COUNTER 15G at planting.

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
SUGAR BEETS	Sugar beet root maggots <sup>4</sup>	<b>Banded or Modified In- Furrow</b> 4-8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing).	<b>Modified In- Furrow</b> Apply in-furrow at planting time 2- 3 inches behind the seed drop zone after some soil has covered the seed.	<b>At Planting</b> 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.
	At Planting Sugar beet leafhopper <sup>5</sup>			
	Aphids <sup>5</sup> Wireworms <sup>4</sup> White Grubs <sup>4</sup>			
	Suppression of: Cutworms	<b>Banded</b> 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing)	<b>Banded</b> Apply in a 5 to 7- inch band over the row and lightly incorporate into the soil with drag chains or tines.	<sup>4</sup> If especially heavy infestations are expected use the 8 oz. rate. <sup>5</sup> Modified in-furrow only at the 8 oz use rate.
	Suppression of: Sugar beet cyst nematode  <b>Control of:</b> Sugar Beet leafhopper Aphids	<b>Knifed-in</b> 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.	<b>Knifed-in</b> Drill granules 2 inches to the side of the seed and 2 to 4 inches below the seed.	<b>Only one application of COUNTER 15G per year may be made.</b>
SUGAR BEETS	Sugar beet root maggot Aphids	<b>Banded</b> 4 to 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing).	<b>Banded</b> Apply in a 5 to 7- inch band over the row and lightly incorporate into the soil with cultivation shovels or other suitable implement.	<b>Post emergence :</b> <i>For sugar beet root maggot control apply at the time of first fly emergence.</i>
Post-emergence	Sugar beet root aphid Sugar beet leafhopper			

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
GRAIN SORGHUM  At Bedding	Greenbugs Corn leaf aphids	<b>Knifed-in:</b> 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.	<b>Knifed-in:</b> Drill granules 1-4 inches below the seed OR 1-4 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.  Only one application of COUNTER 15G per year may be used.
GRAIN SORGHUM  At Planting	Corn rootworms Including southern corn rootworms Wireworms White Grubs Nematodes Greenbugs Corn leaf aphids Chinchbugs <sup>7</sup>	<b>Banded</b> 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.	<b>Banded<sup>6</sup></b> Place granules in a 5 to 7- inch band directly behind the planter shoe in front of the press wheel and lightly incorporate with drag chains or tines.	<sup>6</sup> Do not use banded applications for aphid control in New Mexico, West Texas and the Panhandle of Oklahoma.  Do not graze or harvest grain sorghum forage within 50 days after treatment.  Do not harvest grain sorghum fodder or grain within 100 days after treatment.  <sup>7</sup> For use in the states of Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi and Texas only for early season control of light to moderate infestations.
	Greenbugs Corn leaf aphids	<b>Knifed-in</b> 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.		

\* Beacon is a registered trademark of Ciba Crop Protection.

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**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.	<u>18 oz.</u>
40"	3.3	4.9	6.5	8.2	9.8	11.4	13.1	<u>14.7</u>
38"	3.4	5.2	6.9	8.6	10.3	12.0	13.7	<u>15.4</u>
36"	3.6	5.4	7.3	9.1	10.9	12.7	14.5	<u>16.3</u>
34"	3.9	5.6	7.7	9.7	11.6	13.5	15.4	<u>17.3</u>
32"	4.1	6.1	8.2	10.2	12.3	14.3	16.3	<u>18.3</u>
30"	4.4	6.5	8.7	10.9	13.1	15.2	17.4	<u>19.6</u>
28"	4.7	7.1	9.5	11.8	14.2	16.6	18.9	<u>21.3</u>
26"	5.0	7.6	10.2	12.7	15.3	17.9	20.4	<u>23.0</u>
24"	5.4	8.2	10.9	13.6	16.3	19.1	21.8	<u>24.5</u>
22"	5.9	8.9	11.9	14.9	17.9	21.0	24.0	<u>27.0</u>
20"	6.5	9.8	13.1	16.3	19.6	22.8	26.1	<u>29.4</u>

\*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:

APPLICATOR		PLANTING SPEED		
		3 mph	5 mph	7 mph
John Deere Max Emerge 2	Models 7200 and 7300	16	23	35
John Deere Max-Emerge	Models 7000 and 7100 Odd Notches 5-15-25-35	11	15	19
John Deere Max-Emerge	Models 7000 and 7100 Even Notches 0-10-20-30	13	19	25
John Deere 71 Flexi-Planter	Metal Hoppers	1/28	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.

PM 04

241-238

5-28-97

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 11-30-93

<b>(A)</b>  <b>EPA</b>	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <b>207959</b>
	<b>Application for Pesticide:</b>		
	<b>Section I</b>		

1. Company/Product Number <b>241-238</b>	2. EPA Product Manager <del>R. Whitby</del> <b>W. Jacobs</b>	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) <b>COUNTER® 15G systemic insecticide nematocide</b>	PM# <b>Team 14</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>American Cyanamid Company Agricultural Product Research Division P.O. Box 400 Princeton, NJ 08543-0400</b> <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____ Product Name _____	

**Section II**

<input type="checkbox"/> Amendment - Explain below	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	
<input checked="" type="checkbox"/> Notification - Explain below.	

**NOTIFICATION**  
MAY 28 1997

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of final printed Supplemental Labeling containing a subset of use directions previously approved on the main label per PR Notice 95-2. This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "Yes," Unit Package wgt.      No. per container	If "Yes," Package wgt.      No. per container

3. Location of Net Contents Information  
 Label       Container

4. Size(s) of Retail Container: \_\_\_\_\_

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label is Affixed To Product  
 Lithograph  
 Paper glued  
 Stenciled       Other (\_\_\_\_\_)

**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name <b>John J. Wrubel</b>	Title <b>Product Registrations Manager</b>	Telephone No. (Include Area Code) <b>609-716-2378</b>
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**Certification**  
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature <b>John J. Wrubel</b>	3. Title <b>Product Registrations Manager</b>	6. Date Application Received (Stamped)
4. Typed Name <b>John J. Wrubel</b>	5. Date <b>4/21/97</b>	

systemic insecticide nematocide

# Counter

## 15G

# Supplemental Labeling

**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

**NOTIFICATION**

MAY 28 1997

## For Use of COUNTER<sup>®</sup> 15G for Corn Rootworm Control in First Year Corn

### DIRECTIONS FOR USE

**BEFORE USING, READ PRECAUTIONARY STATEMENTS ON CONTAINER 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 label for specific instructions. This label must be in possession of the user at the time of pesticide application.

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

Crops	Pests Controlled	Rates of COUNTER 15G	Application	Remarks
FIELD CORN	Corn rootworm <sup>1</sup>	Banded or In-furrow or at Cultivation  6 oz per 1,000 ft. of row for any row spacing. Do not exceed 6.5 pounds per acre.	Banded Place granules in a 7-inch band over the row, in front of the presswheel and lightly incorporate with drag chains or tines.  In-Furrow Place granules directly in the seed furrow behind the planter shoe.  At Cultivation: Apply granules to base of plants just ahead of cultivation shovels so as to cover granules with soil.	For use on conventional, conservation or no till 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.  If application is made at planting, do not make postemergence or cultivation time treatments of COUNTER 15G.  Do not graze or cut for forage within 30 days of treatment.  <sup>1</sup> COUNTER 15G controls all species of corn rootworms including southern, northern, western, and Mexican corn rootworms.



American Cyanamid Company  
North America Agricultural Division  
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