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Systems Integration Group, Inc.



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

JUN 23 1999

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Dear Mr. Wrubel:

Subject: Reduction in Knifed-in Maximum Application Rates
For Grain Sorghum and Sugar Beets; and
Revised PHIs For Sugar Beets

Counter 15G
Lock n' Load Closed Loading System Label
EPA Registration No. 241-238 ✓

Counter CR Systemic Insecticide Nematicide
EPA Reg. No. 241-314

Your Applications Dated March 26, 1999

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable for each of the two subject products, provided that you:

Submit one copy of your final printed label for each product incorporating the following corrections before you release the product for shipment.

1. On the Counter CR product, add the preharvest interval statements for sugar beets that **appear on your submitted label for the Counter 15G product. These statements are cited below.**

Do not harvest sugar beets or feed tops to livestock within 110 days after planting banded, at planting modified in furrow or postemergence banded applications. Do not harvest sugar beets or feed tops to livestock within 150 days of a knifed-in application.

2. On the Counter 15 G product, correct the front panel word, handling to loading so that the statement reads as follows:

LOCK n' LOAD Closed Loading System

0 4 15

3. On both products, the word "POISON" must appear on the front panel of the label in red on a contrasting background with the skull and crossbones in immediate proximity.

If this condition is not complied with, the registrations will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of this condition.

A stamped copy of the label for each of the two subject products is enclosed for your records.

Please verify your intent regarding the supplemental labeling for the reduced rate directions for use only on "first year corn". The separation of this supplemental label from the main label was submitted as a notification for each of the two subject products in 1996 and 1997. If this use is to be retained for the products, submit five copies of your complete, master label bearing these use directions for our acceptance. Your master label for each of the two products must bear all the registered uses for each product.

Additionally, if you intend to market the Counter 15 G product in both the closed loading system and in the conventional packaging, the master label must reflect this.

Sincerely,



Marilyn A. Mautz
Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

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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 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
LOCK 'n LOAD® Closed Handling System

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

KEEP OUT OF REACH OF CHILDREN
DANGER! PELIGRO!



JUN 23 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
241-238

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.

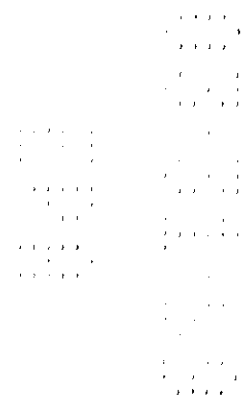
Pralidoxime chloride (2-PAM; PROTOPAM chloride) may be effective as an adjunct to atropine. Use according to label directions.

IN CASE OF AN EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS PRODUCT, CALL COLLECT, DAY OR NIGHT, AREA CODE 973-683-3100.

See back panel for additional precautionary statements.

American Cyanamid Company
North America Agricultural Products Division
Crop Protection Products Division
One Campus Drive
Parsippany, NJ 07054 1999

Net Weight:



® Registered Trademarks of American Cyanamid Company

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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 container 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 container 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. Wash all PPE after each day's use. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. 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.

The **LOCK'n LOAD** system, when used correctly, qualifies as a closed loading system under the WPS. Mixer/Loaders correctly loading this product using the **LOCK'n LOAD** system are permitted to wear:

- long-sleeved shirt and long pants,
- shoes and socks,
- a chemical-resistant apron, and
- waterproof gloves

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided with all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown. The PPE required for applicators and other handlers must be worn when performing all pesticide handling tasks other than loading and application, such as spill clean-up and equipment maintenance, cleaning and repair.

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.

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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.

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 containers.

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

Return empty container to point of purchase.

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	Corn rootworms ¹	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 the presswheel and lightly incorporate with drag chains or tines.	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.
	Wireworms			
At Planting	White grubs	COUNTER 15G per acre.	In-Furrow Place granules directly in the seed furrow behind the planter shoe.	¹ COUNTER 15G controls all species of corn rootworms including southern, northern, western, and Mexican corn rootworms.
	Seedcorn maggots			
	Seedcorn beetles			² For use in the states of Alabama, Florida, Georgia, Louisiana, Mississippi and Texas only for early season control of light to moderate infestations.
	Corn flea beetles			
	Maize billbugs			³ 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.
	Southern corn billbugs			
	Thrips			If application is made at planting, do not make post-emergence or cultivation time treatments of COUNTER 15G.
	Symphylans			
	Chinchbugs ²			
	Nematodes:			
	Lance			
	Lesion			
	Root knot			
	Spiral			
	Stunt			
	Sting			
	Stubby root			
	Dagger			
	Suppression of:			
	Cutworms ³			
	Lesser cornstalk borers			

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
Postemergence 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 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. 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 European cornborer	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. For Field Corn Only: (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 At Planting	Sugar beet root maggots ⁴ Sugar beet leafhopper ⁵ Aphids ⁵ Wireworms ⁴ White Grubs ⁴	Banded or Modified In-Furrow 4-8 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.	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: 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 with drag chains or tines.	⁴ If especially heavy infestations are expected use the 8 oz. rate. ⁵ Modified in-furrow only at the 8 oz use rate.
	Suppression of: Sugar beet cyst nematode Control of: Sugar Beet leafhopper Aphids	Knifed-in 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.	Knifed-in Drill granules 2 inches to the side of the seed and 2 to 4 inches below the seed.	Only one application of COUNTER 15G per year may be made.
SUGAR BEETS Post-emergence	Sugar beet root maggot Aphids Sugar beet root aphid Sugar beet leafhopper	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 with cultivation shovels or other suitable implement.	Post emergence : For sugar beet root maggot control apply at the time of first fly emergence. Do not harvest sugar beets or feed tops to livestock within 110 days after at planting banded, at planting modified infurrow or postemergence banded applications. Do not harvest sugar beets or feed tops to livestock within 150 days of a knifed-in application.

CROPS	Pest Controlled	Rates of COUNTER 15G	Application	Remarks
GRAIN SORGHUM At Bedding	Greenbugs Corn leaf aphids	Knifed-in: 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.	Knifed-in: 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 ⁷	Banded 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.	Banded⁶ 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.	⁶ 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. ⁷ 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	Knifed-in 8 oz. per 1,000 ft. of row spacing for any row spacing (minimum 20 inch row spacing) or no more than 13.1 lbs. of COUNTER 15G per acre.		

* Beacon is a registered trademark of Ciba Crop Protection.

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.
40"	3.3	4.9	6.5
38"	3.4	5.2	6.9
36"	3.6	5.4	7.3
34"	3.9	5.6	7.7
32"	4.1	6.1	8.2
30"	4.4	6.5	8.7
28"	4.7	7.1	9.5
26"	5.0	7.6	10.2
24"	5.4	8.2	10.9
22"	5.9	8.9	11.9
20"	6.5	9.8	13.1

*See directions for specific use rates on each crop.

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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:

		PLANTING SPEED		
APPLICATOR		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.