

241-238

08/01/2006

5795048

1/11



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. David Haughey
Product Registration Manager
BASF Corporation
26 Davis Drive
Research Triangle Park, NC 27709

AUG 1 2006

Dear Mr. Haughey:

Subject: Terbufos IRED Risk Mitigation Labeling
Counter 15G Systemic Insecticide-Nematicide
EPA Reg. No. 241-238
Label Received With Your Application of June 1, 2006

The labeling for the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable as a product registration amendment provided that you submit two copies of your final printed label for the product incorporating the following corrections before you release the product for shipment. Acceptance of the labeling does not constitute reregistration of the product.

1. Delete the phrase "in addition to the PPE listed above for loaders" which appears on page two in the PPE section for other handlers under the heading "IMPORTANT". This section includes a complete listing of the required PPE for other handlers.
2. Correct the designation "closed handling system" to "closed loading system" wherever the designation appears throughout the label. Please refer to item 16 in our previous letter dated April 20, 2006. The designation was corrected on the front page but still appears in other areas of the label.
3. Remove the phrase "same as crops above" which appears on page six in the directions for use on sorghum at bedding. The crop above is not the same crop.
4. Correct the warranty and disclaimer statements so that they are consistent with the Agency policy regarding such statements. The current Label Review Manual (guidance document on the OPP website at <http://www.epa.gov/oppfead1/labeling/lrm/>) incorporates these policy statements.

In general, OPP will not accept: (1) disclaimers that attempt to limit liability for what is expressly warranted by statements on the label; and (2) statements that ignore that the possibility of warranty enforcement under state or other applicable laws governing warranties. The State and local laws may not allow certain limitations of liability or remedy. Disclaimers that purport to limit liability for statements made or implied by the label are not acceptable (e.g., "this product

may not work as intended" or "seller makes no warranty of results to be obtained by use of the product"). The attachment contains examples of problematic warranty statements. The problematic portions of the label statements are stricken, and necessary language is added in red.

The attachment shows the addition of the phrase, "to the extent consistent with applicable law" to the disclaimers of liability and damages to avoid the statements being false or misleading. Some states or localities may not allow certain disclaimers of liability or damages; therefore, the user/buyer may have a remedy under other law governing warranties.

The statement relating to using the product in accordance with its labeling is corrected on the attachment from "should" to "must". The phrase "should follow directions" could mislead users to believe that the directions for use are only suggestions and not enforceable restrictions on how the product may be used.

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

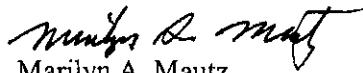
A stamped copy of the label for the subject product is enclosed for your records.

The additional item cited below is required prior to any issuance of reregistration for the product.

The data compensation regulations and procedures must be met for all the generic data requirements for the subject product. They may be addressed by citing the supporting generic data in the IRED, Appendix B. Data received by the Agency in fulfillment of the data requirements designated as data gaps in the IRED must also be cited. Since the IRED has been issued for the active ingredient, the cite-all method of support may not be utilized for reregistration of the subject product. The data cited/provided with your subject reregistration application did address these requirements for certain of the generic data; i.e. product chemistry data and the generic acute toxicity data.

Any issuance of reregistration for the product must await completion of the cumulative risk assessment for the organophosphate pesticides.

Sincerely,



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

Attachment: Warranty and Liability Example Statements

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and ~~should~~ must be followed carefully. However, it is impossible to eliminate all risks associated with the 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 manner of use or application, all of which are beyond the control of XXXX. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, XXX makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of XXX is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, XXX disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

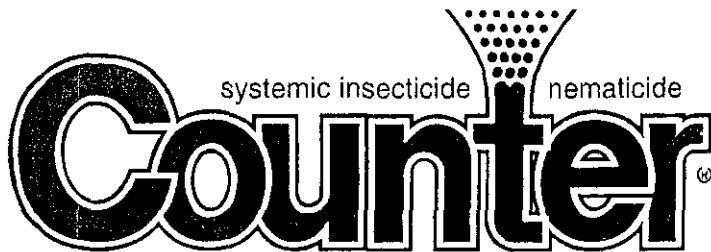
LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at XXX's election, the replacement of product.

4/11

RESTRICTED USE PESTICIDE

Due to Acute Oral, Dermal and Inhalation Toxicity
and Risks to Aquatic Organisms and Wildlife.

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.



BASF Corporation endorses Certification to promote the responsible use of pesticides to ensure the protection of man and the environment.



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.

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

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.)

FIRST AID	
Organophosphate (a cholinesterase inhibitor) CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING.	
If swallowed	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. DO NOT induce vomiting unless told to do so by a poison control center or doctor. DO NOT give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Repeated inhalation or skin contact may, without symptoms, progressively increase susceptibility to poisoning. Have the product leaflet label with you when calling a poison control center or doctor, or going for treatment. Antidote: Atropine is an antidote.	
HOT LINE	Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact BASF Corporation for emergency medical treatment information: 1 800 832-HELP (4357).

See inside for **PRECAUTIONARY STATEMENTS, DIRECTIONS FOR USE** and **CONDITIONS OF SALE AND WARRANTY.**



BASF Corporation
Agricultural Products
26 Davis Drive
Research Triangle Park, NC 27709

ACCEPTED
with COMMENTS
in EPA Letter Dated:
AUG 1 2006
Under the Federal Insecticide, Fungicide, and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No. 241-238



5/11

NOTE TO PHYSICIANS

Warning signs and symptoms include weakness, muscle twitching, headache, tightness in chest, respiratory depression, blurred vision, miosis, hypersecretion, nausea, vomiting, diarrhea, and abdominal cramps. If poisoning is probable, treat the patient immediately. Clear airway and provide oxygen before administering atropine. Give atropine intravenously (IV), intramuscularly or through an alternative route such as an endotracheal tube. Depending on severity of poisoning, use 2 to 4 milligrams IV in adults (or 0.05 mg/kg in children under 12 years) every 10 – 15 minutes until fully atropinized as shown primarily by control of pulmonary secretions. Proceed concurrently with decontamination using proper protective gear; for example, chemical-resistant gloves rather than cotton or leather ones. Use soap (preferably, tincture of green soap) and water, or a dilute hypochlorite solution, for decontaminating skin. Maintain atropinization by repeated doses based on recurrence of symptoms. Twenty to thirty milligrams, or more, may be required during the first 24 hours, and preservative-free atropine preparation should be used if large doses are required. Generally, inducing emesis is not advisable. Avoid opiates, parasympathomimetic agents (e.g. succinylcholine), theophylline, reserpine, and or phenothiazines. Suction oral secretions and emesis to avoid aspiration. Artificial respiration or oxygen administration may be necessary. Probable mucosal damage may contraindicate the use of gastric lavage. If *not contraindicated*, gastric emptying by lavage may be considered after ingestion of a potentially life-threatening amount if it can be performed soon after ingestion (within an hour). A slurry of activated charcoal may be medically warranted at an oral dose appropriate for adult, child, or infant. For seizures, give a benzodiazepine intravenously. Observe patient continuously for at least 72 hours. Allow no further exposure until cholinesterase regeneration has taken place as determined by blood tests.

Pralidoxime chloride (2-PAM; PROTOPAM chloride) appears to be an effective adjunct to atropine, especially in those severely ill and if given soon. Before it's administered, obtain a blood sample for cholinesterase analysis. Adjusting for age and weight, pralidoxime may be administered as a continuous infusion after a loading dose or using a bolus method.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER!

Fatal if swallowed, inhaled, or absorbed through the skin. Corrosive. Cause irreversible eye damage. **DO NOT** breathe dust. **DO NOT** get in eyes, on skin, or on clothing.

DO NOT Breathe Dust.

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.

WORK SAFETY RULES (continued)

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 **First Aid** section.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are those made of waterproof material. If you want more options, follow the instructions for **Category A** on an EPA chemical-resistance category selection chart.

Loaders, applicators and other handlers using engineering controls must wear:

- Long-sleeved shirt and long pants.
- Shoes plus socks.

In addition to the above, loaders must also wear:

- Chemical resistant gloves (such as those made of waterproof material).
- Chemical resistant apron.
- See engineering controls for additional requirements.

IMPORTANT: In addition to the PPE listed above for loaders, all other handlers performing tasks such as spill clean up or equipment cleaning, for which engineering controls are not feasible must wear:

- Coveralls over long sleeved shirt and long pants,
- Chemical resistant footwear plus socks,
- Chemical resistant gloves,
- protective eyewear,
- a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH) approved number prefix TC 23C, or a canister approved for pesticides (MSH/NIOSH-approval number prefix TC-14G), or a NIOSH-approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE filter,
- Chemical resistant apron if exposed to concentrate.

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry. Wash all PPE after each day's use.

DO NOT reuse contaminated clothing. Clothing and protection equipment heavily contaminated must be destroyed according to state and local regulations. **HEAVILY CONTAMINATED CLOTHING CANNOT BE ADEQUATELY DECONTAMINATED.**

Engineering Controls

This product is formulated into an enclosed system (**LOCK'n LOAD**®) that meets the definition of a closed loading system as defined by the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d) (4)]. In addition to wearing the required PPE for loaders using engineering controls, loaders must be provided, must have immediately available, and must wear in case of a broken package, spill or equipment breakdown: coveralls, protective eyewear, chemical resistant footwear plus socks, 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) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

6/11

Engineering Controls (continued)

Applicators must use an enclosed cab that meets the definition in the Worker Protection Standard for Agricultural Pesticides for dermal protection. In addition, the applicator:

- Must wear the PPE required for handlers using engineering controls.
- Must either use an enclosed cab that also provides equivalent respiratory protection to an organic vapor-removing respirator or wear 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), or a NIOSH- approved respirator with an organic vapor (OV) cartridge, or canister with any N, R, P or HE prefilter.
- Must be provided with, must have immediately available for use, and must wear if they must exit the cab in the treated area: protective eyewear, coveralls, chemical resistant gloves, chemical resistant footwear plus socks, and if using an enclosed cab that provides respiratory protection, 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), or a NIOSH approved respirator with an organic vapor (OV) cartridge, or canister with any N, R, P or HE prefilter.
- Must take off any PPE that was worn in the treated area before reentering the cab.
- Must store all such PPE in a chemical-resistant container such as a plastic bag, to prevent contamination inside of the cab.

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.

FAILURE TO FOLLOW PRECAUTIONS INCLUDING WEARING PROPER PERSONAL PROTECTIVE EQUIPMENT (PPE) MAY RESULT IN SERIOUS OR EVEN LIFE-THREATENING POISONING REQUIRING IMMEDIATE MEDICAL ATTENTION. THE ACTIVE INGREDIENT OF THIS GRANULAR FORMULATION CAN BE ABSORBED THROUGH THE SKIN TO CAUSE POISONING.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish and wildlife and has been known to cause fish kills. Runoff may be hazardous to aquatic organisms in neighboring areas. **DO NOT** apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. **DO NOT** contaminate water when disposing of equipment wastewater or rinsate. See **Directions For Use** for required buffer zones or setbacks. Birds and mammals may be killed if granules are not properly covered with soil in all areas of the treated field and in loading areas. Cover, incorporate or clean up product that is spilled during loading or that is visible on the soil surface in turn areas.

DO NOT apply in wet soil conditions that may prevent the equipment from covering pesticide granules. **DO NOT** apply to frequently flooded areas.

Under certain field conditions, terbufos and its degradates have a potential for runoff into surface water for several weeks following application. Keep out of lakes, ponds, and streams.

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**. The **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 that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls over long-sleeved shirt and long pants.
- Chemical-resistant gloves (such as those made of waterproof material).
- Chemical-resistant footwear plus socks.
- Protective eyewear.

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.

7/11

**BEFORE USING,
READ PRECAUTIONARY STATEMENTS
AND ENVIRONMENTAL HAZARDS.**

Loader and applicator requirements to minimize the potential for runoff to surface water:

- Maintain a 500 ft vegetative buffer between treated area and surface water on neighboring land.
- Maintain a 500 ft buffer between a standpipe drain outlet and surface water on neighboring land.
- Maintain a 66 ft setback between the treated area and entry points to surface water bodies on non-highly erodible soils.
- Maintain a 300 ft setback between the treated area and entry points to surface water bodies on highly erodible soils (HES).
- Maintain a 66 ft setback between treated area and standpipes on terraced fields as well as a 66 ft vegetative buffer between the tile outlet and entry points to surface water bodies.

All setbacks must be planted to a crop or seeded with grass or other suitable cover, and all vegetative buffers must be seeded with grass or other suitable cover.

DO NOT load, rinse or wash equipment within 300 ft from surface water bodies.

DO NOT load, rinse, or wash equipment within 50 ft from wells unless conducted on an impervious surface.

To prevent channeling of surface water runoff, adjust the planter row-cleaners appropriately to prevent rows lower in height than adjacent soil.

8/11

Crops	Pests Controlled	Rate of Counter® 15G systemic insecticide nematocide LOCK'n LOAD® closed handling system	Application	Remarks
FIELD CORN, FIELD CORN GROWN FOR SEED, POPCORN AND SWEET CORN At Planting	Corn rootworms ¹ Wireworms White grubs Seedcorn maggots Seedcorn beetles Corn flea beetles Maize billbugs Southern corn billbugs Thrips Symphylans Chinchbugs ² Nematodes: Lance Lesion Root knot Spiral Stunt Sting Stubby root Dagger Suppression of: Cutworms ³ Lesser cornstalk borers	Banded or In-Furrow 6.0 ⁴ 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 Place granules in a 7-inch band over the row, in front of the presswheel and incorporate evenly into the top 1 inch of the soil. In-Furrow Place granules directly in the seed furrow behind the planter shoe.	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. The presswheel should be adjusted so that the closed seed furrow is higher than the surrounding soil to reduce the potential for insecticide run-off resulting from excessive rain. ¹ Counter 15G controls all species of corn rootworms including Southern, Northern, Western, and Mexican corn rootworms. ² For use in the states of Alabama, Florida, Georgia, Louisiana, Mississippi and Texas only for early season control of light to moderate infestations. 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. ⁴ The 6.0 oz. rate should only be used on first-year corn. Use the high rate on first-year corn where heavy rootworm population pressures are anticipated or for control of other pests. If application is made at planting, do not make postemergence or cultivation time treatments of Counter 15G. ALS-inhibiting herbicides* SHOULD NOT be used if Counter 15G has been applied to corn at the time of planting. See additional information for "at cultivation" applications.
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, postemergence 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	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 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 ALS-inhibiting herbicides*.

* Such as Accent®, Accent Gold®, Basis Gold®, Steadfast®, Beacon®, Exceed®, Hornet™, Permit®, Scorpion III®, Celebrity®, Celebrity® Plus, Lightning®, Northstar™ and Spirit™ herbicides.

9/11

Crops	Pests Controlled	Rate of Counter® 15G systemic insecticide nematicide LOCK'n LOAD® closed handling system	Application	Remarks
SUGAR BEETS At Planting	Sugar beet root maggots ⁵ Sugar beet leafhopper ⁶ Aphids ⁶ Wireworms ⁵ White Grubs ⁵ Crown borer	Banded or Modified in-Furrow 4 - 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.	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 or crop injury may occur. Power incorporation may be used. DO NOT incorporate deeper than 2 inches. ⁵ If especially heavy infestations are expected, use the 8 oz. rate. ⁶ Modified in-furrow only at the 8 oz. rate.
	Suppression of: Cutworms	Banded 8 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or more than 13.1 lbs. of Counter 15G per acre.	Banded Apply in 5- to 7-inch band over the row and lightly incorporate into the soil with drag chains or tines.	
	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 more than 13.1 lbs. of Counter 15G per acre.	Knifed-In Drill granules 2-inches into 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 Postemergence	Sugar beet root maggots Sugar beet leafhopper Aphid Sugar beet root aphid Sugar beet leafhopper Crown borer ⁷	Banded 4 - 8 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing).	Banded Apply in 5 to 7-inch band over the row and lightly incorporate into the soil with cultivation shovels or other suitable implement.	Postemergence 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 in-furrow or postemergence banded applications. DO NOT harvest sugar beets or feed tops to livestock within 150 days of a knifed-in application. ⁷ Postemergence - apply Counter 15G at the first sign of crown borer infestation.
Grain Sorghum At Bedding (Same as crops above)	Greenbugs Corn leaf aphids	Knifed-in 7 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 11.3 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 ⁹	Banded 7 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 11.3 lbs. of Counter 15G per acre.	Banded⁸ 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.	⁸DO 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. ⁹ 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 7 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 11.3 lbs. of Counter 15G per acre.		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.

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

Row Width (inches)	Application Rates (oz/1000 ft of row)		
	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.

CALIBRATION INFORMATION

FIRST READ THIS LABEL

It is important the 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 or 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 Odd Notches 5-15-25-35	Models 7000 and 7100	11	15	19
John Deere Max-Emerge Even Notches 0-10-20-30	Models 7000 and 7100	13	19	25
John Deere 71 Flexi-Planter	Metal Hoppers	1/28	2/6.0	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® 15G systemic insecticide nematocide LOCK'n LOAD® closed handling system** used against the known length of row 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.

11/11

Conditions of Sale and Warranty

The **Directions For Use** of this product reflects the opinion of experts based on field use and tests. 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 use of the product in a manner inconsistent with its labeling, all of which are beyond the control of BASF CORPORATION ("BASF") or the Seller. All such risks shall be assumed by the Buyer.

BASF warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the **Directions For Use**, subject to the inherent risks, referred to above.

BASF MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. TO THE EXTENT PERMITTED BY LAW, BASF AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. BASF and the Seller offer this product, and the Buyer and User accept it, subject to the foregoing

Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative of BASF.

Celebrity, Counter, Lightning, and LOCK'n LOAD are registered trademarks of BASF Corporation.

Accent, Accent Gold, Basis Gold and Steadfast are registered trademarks of E.I. DuPont de Nemours & Co., Inc.

Beacon and Exceed are registered trademarks and **Northstar and Spirit** are trademarks of Syngenta Crop Protection, Inc.

Hornet is a trademark and **Scorpion III** is a registered trademark of Dow Agrosciences LLC.

Permit is a registered trademark of Nissan Chemical Industries, Ltd.

©2006 BASF Corporation
All rights reserved.

000241-00238.20060530.NVA 2006-04-112-0173
Supersedes: NVA 2005-04-112-0177

BASF Corporation
Agricultural Products
26 Davis Drive
Research Triangle Park, NC 27709



The Chemical Company