

PH 14 241-314

filed 9/15



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

FEB 24 1994

JOHN J ARTHUR
AMERICAN CYANAMID COMPANY
AGRI RESEARCH DIV - U.S. REGULATORY AFFA
BOX 400
PRINCETON, NJ 08543

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 8/24/93 Response to PR Notice 93-7
EPA Reg. No. 241-314
COUNTER XL SYSTEMIC INSECTICIDE NEMATICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with Soy/Canola ink on paper that
contains at least 50% recycled fiber

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Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

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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® 20CR®
systemic insecticide nematocide

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

Active Ingredient: terbufos: S-[[[(1,1-dimethylethyl)thio]methyl]		
0,0-diethyl phosphorodithioate		20.0%
Inert Ingredients		80.0%
	Total	100.0%

EPA Reg. No. 241-314

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

DANGER! PELIGRO!

POISON



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.

ACCEPTED
with COMMENTS
in EPA Letter Dated

FEB 24 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
241-314

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 201-835-3160.

See next page for additional precautionary statements.

Net Weight:

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American Cyanamid Company
Agricultural Products Division
Crop Protection Chemical Department
Wayne, NJ 07470 © 1993

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

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

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

Personal Protective Equipment (PPE):

Applicators and other handlers must wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical-resistant gloves such as nitrile or neoprene rubber
- Chemical-resistant footwear plus socks
- Protective eyewear

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- 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. ~~Clothing and protective equipment heavily contaminated with terbufos must be destroyed according to State and local regulations.~~

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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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, wither 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 to 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
- Chemical-resistant gloves such as nitrile or neoprene rubber
- 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 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.

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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 20CR. 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 20CR 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	Rates of COUNTER 20CR	Application	Remarks
FIELD CORN, POPCORN AND SWEET CORN	Corn rootworms	6 oz. per 1,000 ft. of row for any row spacing.	Banded or In-furrow Place granules in a 7-inch band over the row, in front of or behind the presswheel and lightly incorporate.	For use on conventional and conservation tillage corn. In situations where crop debris or winds can prevent proper placement of granules, in-furrow applications are recommended. In-furrow applications reduce the potential for insecticide runoff resulting from excessive rain.
	Wireworms			
	White grubs			
	Seedcorn maggots			
	Seedcorn beetles			
	Corn flea beetles			
	Maize billbugs			
	Southern corn billbugs			
	Thrips			
	Symphylans			
At Planting	Nematodes	Do not exceed 6.5 pounds per acre.	In-Furrow Place granules directly in the seed furrow behind the planter shoe.	Under dry soil conditions or heavy infestations, it may be necessary to apply an insecticide rescue treatment with another registered insecticide after corn emergence to control surviving cutworm larvae.
	Lance			
	Lesion			
	Root knot			
	Spiral			
	Stunt			
	Sting			
	Stubby root			
	Dagger			
	Suppression of:			
Cutworms				
Lesser cornstalk borers				
	Chinch bugs ¹	In-Furrow 6 oz per 1000 ft. of row for any row spacing. Do not exceed 6.5 pounds of COUNTER 20CR per acre.		1For use in the states of Alabama, Florida, Georgia, Louisiana, Mississippi and Texas only. For early season control of light to moderate infestations.

Crops	Pests Controlled	Rates of COUNTER 20CR	Application	Remarks
<p>At Planting (cont'd)</p> <p>(Same crop as previous page)</p>	<p>Maize billbugs Southern corn billbugs</p>	<p>Banded 6 oz. per 1,000 ft. of row for any row spacing. Do not exceed 6.5 pounds per acre.</p>	<p>Banded Apply in a 7-inch band over the row of seedling corn plants and lightly incorporate into the soil when billbugs or damage are observed, usually in the 1 to 6-leaf stage of growth. Use cultivators or other suitable implements to lightly incorporate granules into soil.</p>	<p>FOR FIELD CORN ONLY: It is American Cyanamid Company's recommendation that Accent* herbicide may be applied after BANDED applications of COUNTER 20CR.</p> <p>Applications of Accent herbicide following applications of COUNTER 20CR may result in temporary crop injury.</p> <p>Only one at planting, post-emergence incorporated or cultivation time treatment of COUNTER may be used.</p> <p>Do not graze or cut for forage within 30 days of treatment.</p> <p>Consult your state experiment station, state extension service or certified pest management specialist for proper timing of application.</p>

Crops	Pests Controlled	Rates of COUNTER 20CR	Application	Remarks
At Cultivation (Same crop as previous page)	Corn rootworms European cornborers	6 oz. per 1,000 ft. of row for any row spacing. Do not exceed 6.5 pounds 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.	<p>Only one at planting, post-emergence incorporated or cultivation time treatment of COUNTER may be used.</p> <p>Do not graze or cut for forage within 30 days of treatment.</p> <p>FOR FIELD CORN ONLY: COUNTER 20CR may be applied 7 days after application of Beacon herbicide.</p> <p>American Cyanamid Company does not recommend using Beacon herbicide following use of COUNTER 20CR at planting.</p>

* Accent is a registered trademark of E. I. DuPont De Nemours & Company.

** Beacor. is a registered trademark of Ciba Geigy Corporation.

Crops	Pests Controlled	Rates of COUNTER 20CR	Application	Remarks
SUGAR BEETS At Planting	Sugar beet root maggot ² Wireworms ² White grubs ²	Banded or Modified In-furrow 3-6 oz. per 1,000 ft. or 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 6 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.	² If especially heavy infestations are expected use the 6 oz. rate.
	Suppression of: Sugar beet cyst nematode Control of: Beet leafhopper	Knifed-in 12 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 19.6 lbs. per acre.	Knifed-in Drill granules 2 inches to the side of the seed and 2-4 inches below the seed.	Only one application of COUNTER per year may be used.
SUGAR BEETS Post-emergence	Sugar beet root maggot	Banded 3-6 oz. per 1,000 ft. of row for any spacing (minimum 20-inch row spacing).	Banded Apply in a 5 to 7-inch band over the row and lightly incorporate into the soil.	Postemergence Apply at the time of first fly emergence. Lightly incorporate into the soil.

Crops	Pests Controlled	Rates of COUNTER 20CR	Application	Remarks
GRAIN SORGHUM	Greenbugs Corn leaf aphids	Knifed-in 6-12 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 19.6 lbs. 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.
	At Bedding			
GRAIN SORGHUM	Corn rootworms Wireworms White grubs Nematodes Greenbugs Corn leaf aphids	Banded 6 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 9.8 lbs. per acre.	Banded³ Place granules in a 7-inch band over the row, in front of or behind the presswheel and lightly incorporate.	Only one application of COUNTER per year may be used. ³ Do not use banded applications for aphid control in New Mexico, West Texas and the panhandle of Oklahoma.
	At Planting			
	Greenbugs Corn leaf aphids	Knifed-in 6-12 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 19.6 lbs. per acre.		

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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)	3oz.	4oz.	6oz.	8oz.	9oz.	10oz.	12oz.
40"	2.5	3.3	4.9	6.5	7.4	8.2	9.8
38"	2.6	3.4	5.2	6.9	7.8	8.6	10.3
36"	2.7	3.6	5.4	7.3	8.2	9.1	10.9
34"	2.8	3.9	5.6	7.7	8.7	9.7	11.6
32"	3.1	4.1	6.1	8.2	9.2	10.2	12.3
30"	3.3	4.4	6.5	8.7	9.8	10.9	13.1
28"	3.5	4.7	7.1	9.5	10.7	11.8	14.2
26"	3.8	5.0	7.6	10.2	11.4	12.7	15.3
24"	4.1	5.4	8.2	10.9	12.2	13.6	16.3
22"	4.5	5.9	8.9	11.9	13.5	14.9	17.9
20"	4.9	6.5	9.8	13.1	14.7	16.3	19.6

*See directions for specific use rates on each crop.