

5481-545

09/06/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D C 20460

**NOTIFICATION**  
**SEP 06 2012**

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Krystal Bailey  
AMVAC Chemical Corporation  
4695 MacArthur Ct #1200  
Newport Beach, CA 92660

Subject Notification to update Container Disposal statement per PRN 2007-4 and to  
add Emergency Contact Information  
EPA Registration # 5481-545  
Primary Brand Name Counter 15G Systemic Insecticide-Nematicide  
Submission Date August 15, 2012  
Decision No 469313

Dear Ms Bailey

The Agency is in receipt of your Application for Pesticide Notification under PRN 2007-4 dated August 15, 2012 for EPA registration # 5481-545 **The Registration Division (RD) has conducted a review of this request and finds that the label changes requested fall within the scope of (PRN) 2007-4** The label has been date-stamped "Notification" and will be placed in our records

Please be reminded that 40 CFR Part 156 140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at benbow gene@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Gene Benbow", with a long, sweeping horizontal line extending to the right.

Gene Benbow  
Wildlife Biologist  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Please read instructions on reverse before completing form

Form Approved, OMB No 2070-0060

Print Form



United States  
Environmental Protection Agency  
Washington DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1 Company/Product Number 5481 545	2 EPA Product Manager Eagle	3 Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) Counter 15G	PM# 1	
5 Name and Address of Applicant (Include ZIP Code)  AMVAC Chemical Corporation 4695 MacArthur Ct #1200 Newport Beach CA 92660  <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 type="checkbox"/> Me Too" Application
<input checked="" type="checkbox"/> Notification Explain below	<input type="checkbox"/> Other Explain below

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

Notification of Storage and Disposal per PR Notice 2007 4

Section - III

1 Material This Product Will Be Packaged In			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2 Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt	No per container
		If "Yes" Package wgt	No per container
3 Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(s) Retail Container 40 lbs / 50 lbs	
		5 Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6 Manner in Which Label is Affixed to Product		<input checked="" 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 Krystal Bailey	Title Regulatory Specialist	Telephone No (Include Area Code) 949 221 6146
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		6 Date Application Received  (Stamped)
2 Signature 	3 Title Regulatory Specialist	
4 Typed Name Krystal Bailey	5 Date August 15 2012	



August 15 2012

Ms Venus Eagle PM-1  
U S Environmental Protection Agency  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
Room S4900 One Potomac Yard  
2777 Crystal Drive  
Arlington VA 22202

Dear Ms Eagle

**RE COUNTER 15G (EPA Reg No 5481-545)  
Notification for Storage and Disposal Per PR Notice 2007-4**

AMVAC would like to amend the above named product per Pesticide Registration Notice (PR) 2007-4 Labeling Revisions Required by the Final Rule Pesticide Management and Disposal Standards for Pesticide Containers and Containment

Please note that we are revising the emergency and company contact phone numbers on the label along with this submission This is normally a non-notification but we would like to have them on the official final printed label

In support of this request please find enclosed the following documents

- 1) Application for Pesticide Registration (EPA form 8570-1) form
- 2) One copy of the final product labeling
- 3) Certification with Respect to Label Integrity form
- 4) A CD containing the label in electronic format

**Notification of label change per PR Notice 2007-4 This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156 10, 156 140, 156 144, 156 146, and 156 156 No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156 10, 156 140, 156 144, 156 146, and 156 156, 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**



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If you have any questions or require additional information please feel free to contact me at 949-221-6146 or email me at [KrystalB@amvac-chemical.com](mailto:KrystalB@amvac-chemical.com)

Kind regards

A handwritten signature in cursive script, appearing to read "Krystal Bailey".

Krystal Bailey Regulatory Specialist  
AMVAC Chemical Corporation  
cc C Davis AMVAC

**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

**COUNTER<sup>®</sup> 15G**

**SYSTEMIC INSECTICIDE NEMATOCIDE**

*Alternate Wording when packaged in LOCK N LOAD* **LOCK'n LOAD<sup>®</sup> CLOSED LOADING SYSTEM**

*Alternate Wording when packaged in SMARTBOX* **SMARTBOX<sup>®</sup> CLOSED LOADING 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

**By Weight**

15 0%

**INERT INGREDIENTS**

85 0%

**TOTAL**

100 0%

**NOTIFICATION**

**SEP 06 2012**

**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 the label find someone to explain it to you in detail )

<b>FIRST AID</b>	
<b>Organophosphate (a cholinesterase inhibitor)</b>	
<b>CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING</b>	
<b>If swallowed</b>	Call a poison control center or doctor immediately for treatment advice Have person sip a glass of water if able to swallow <b>DO NOT</b> induce vomiting unless told to do so by a poison control center or doctor <b>DO NOT</b> give anything by mouth to an unconscious person
<b>If inhaled</b>	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
<b>If on skin or clothing</b>	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
<b>If in eyes</b>	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 label with you when calling a poison control center or doctor or going for treatment <b>Antidote</b> Atropine is an antidote	
<b>EMERGENCY INFORMATION</b>	
Have the product container or label with you when calling a poison control center or doctor or going for treatment Call a physician in all cases of suspected poisoning If warning symptoms appear, keep patient prone and quiet Start artificial respiration immediately if patient is not breathing Transport the patient immediately to the nearest hospital <b>FOR THE FOLLOWING EMERGENCIES PHONE 24 HOURS A DAY</b> For Medical Emergencies phone 1 888 681 4261 For Transportation Emergencies including spill leak or fire phone CHEMTREC 1 800 424 9300 For Product Use Information phone AMVAC 1 888 462 6822	

See inside for **PRECAUTIONARY STATEMENTS DIRECTIONS FOR USE and LIMITED WARRANTY AND DISCLAIMER**

EPA Reg No 5481-545

Net Weight As Marked on Container

EPA Est No \_\_\_\_\_



4100 E Washington Boulevard  
Los Angeles CA 90023  
1-323-264-3910 1 888 462 6822

### 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 to 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 is 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 Causes irreversible eye damage **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 attached to the hopper it is recommended that it be used 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 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 Information Center 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 Information Center 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 mouths 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** 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 approval 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 prefilter
- 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®** *Alternate Wording when packaged in SMARTBOX SMARTBOX®*) 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

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 23G) 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.

Alternate Wording when packaged in SMARTBOX Please refer to the SMARTBOX operator's manual for detailed information on system operation and calibration procedures.

### 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

**DO NOT** contaminate water, food, or feed by storage or disposal.

**PESTICIDE 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 open containers.

**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. Open dumping is prohibited.

Alternate Wording when packaged in LOCK nLOAD

**CONTAINER DISPOSAL** Refillable Container: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate



collection system Repeat this rinsing procedure two more times Return empty container to point of purchase

Alternate Wording when packaged in SMARTBOX

**CONTAINER RETURN** Do not discard the container All SMARTBOX containers must be returned per instructions provided Do not attempt to open or tamper with the container Once empty containers are not intended for reuse

### 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

Crops	Pests Controlled	Rate of Counter <sup>®</sup> 15G Systemic Insecticide Nematicide	Application	Remarks
<b>FIELD CORN, FIELD CORN GROWN FOR SEED, POPCORN AND SWEET CORN At Planting</b>	Corn rootworms <sup>1</sup> Wireworms White grubs Seedcorn maggots Seedcorn beetles Corn flea beetles Maize billbugs Southern corn billbugs Thrips Symphylans Chinchbugs <sup>2</sup> Nematodes Lance Lesion Root Knot Spiral Stunt Stung Stubby root Dagger Suppression of Cutworms <sup>3</sup> Lesser cornstalk borers	<b>Banded or In-Furrow</b> 6 0 <sup>4</sup> to 8 oz per 1 000 ft of row for any row spacing <b>DO NOT</b> exceed 8 7 pounds of Counter 15G per acre	<b>Banded</b> 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  <b>In-Furrow</b> 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  <sup>1</sup> Counter 15G controls 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 <b>registered insecticide</b> after corn

				<p>emergence to control surviving cutworm larvae</p> <p><sup>4</sup>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</p> <p><b>If application is made at planting, do not make postemergence or cultivation time treatments of Counter 15G</b></p> <p>ALS inhibiting herbicides* SHOULD NOT be used if <b>Counter 15G</b> has been applied to corn at the time of planting See additional information for at cultivation applications</p>
<b>Postemergence Incorporated (Same as crops above)</b>	Maize billbugs Southern corn billbugs	<b>Banded</b> 8 oz per 1 000 ft of row for any row spacing <b>DO NOT</b> exceed 8 7 pounds of <b>Counter 15G</b> 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	<p><b>Only one at-planting, postemergence incorporated, or cultivation-time treatment of Counter 15G may be used</b></p> <p>Consult your state experiment station state extension service or certified pest management specialist for proper timing of application</p>
<b>At Cultivation (Same as crops above)</b>	Corn rootworms	8 oz per 1 000 ft of row for any row spacing <b>DO NOT</b> exceed 8 7 pounds of <b>Counter 15G</b> per acre	Apply granules to base of plants just ahead of cultivation shovels so as to cover granules with soil	<p><b>DO NOT</b> graze or cut for forage within 30 days of treatment</p> <p><b>DO NOT</b> harvest sweet corn within 60 days after application</p> <p><b>For Field Corn Only (Excluding Field Corn Grown For Seed)</b></p> <p><b>Counter 15G</b> may be applied 7 days after application of ALS inhibiting herbicides*</p>

\*Such as Accent<sup>®</sup>, Accent Gold<sup>®</sup>, Basis Gold<sup>®</sup>, Steadfast<sup>®</sup>, Beacon<sup>®</sup>, Exceed<sup>®</sup>, Hornet<sup>™</sup>, Permit<sup>®</sup>, Scorpion III<sup>®</sup>, Celebrity<sup>®</sup>, Celebrity Plus<sup>®</sup>, Lightning<sup>®</sup>, Northstar<sup>™</sup>, and Spirit<sup>™</sup> herbicides

Crops	Pests Controlled	Rate of Counter <sup>®</sup> 15G Systemic Insecticide Nematicide	Application	Remarks
<b>SUGAR BEETS At Planting</b>	Sugar beet root maggots <sup>5</sup> Sugar beet leafhopper <sup>6</sup> Aphids <sup>6</sup> Wireworms <sup>5</sup> White Grubs <sup>5</sup>	<b>Banded or Modified In-Furrow</b> 4 8 oz per 1 000 ft of row for any row spacing (minimum 20	<b>Modified In-Furrow</b> Apply in furrow at planting time 2 3 inches behind the seed drop zone after some soil has	<p><b>At Planting</b></p> <p><b>DO NOT</b> place granules in direct contact with the seed or crop injury may occur Power incorporation may be used</p> <p><b>DO NOT</b> incorporate deeper than 2</p>

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	Crown borer	inch row spacing) or no more than 13 1 lbs of <b>Counter 15G</b> per acre	covered the seed	inches  <sup>5</sup> If especially heavy infestations are expected use the 8 oz rate
	<b>Suppression of Cutworms</b>	<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 <b>Counter 15G</b> per acre	<b>Banded</b> Apply in 5 to 7 inch band over the row and lightly incorporate into the soil with drag chains or tines	<sup>6</sup> Modified in furrow only at the 8 oz rate  <b>Only one application of Counter 15G per year may be made</b>
	<b>Suppression of Sugar beet cyst nematode Control of Sugar beet leafhopper Aphids</b>	<b>Knifed-in</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 <b>Counter 15G</b> per acre	<b>Knifed-In</b> Drill granules 2 inches into the side of the seed and 2 to 4 inches below the seed	
<b>SUGAR BEETS Postemergence</b>	Sugar beet root maggots Sugar beet leafhopper Aphid Sugar beet root aphid Crown borer <sup>7</sup>	<b>Banded</b> 4 8 oz per 1 000 ft of row for any row spacing (minimum 20 inch row spacing)	<b>Banded</b> Apply in 5 to 7 inch band over the row and lightly incorporate into the soil with cultivation shovels or other suitable implement	<b>Postemergence</b> For sugar beet root maggot control apply at the time of first fly emergence  <b>DO NOT</b> harvest sugar beets or feed tops to livestock within 110 days after at planting banded at planting modified in furrow or postemergence banded applications  <b>DO NOT</b> harvest sugar beets or feed tops to livestock within 150 days of a knifed in application  <sup>7</sup> Postemergence – apply <b>Counter 15G</b> at the first sign of crown borer infestation
<b>GRAIN SORGHUM At Bedding</b>	Greenbugs Corn leaf aphids	<b>Knifed-in</b> 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 <b>Counter 15G</b> 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	<b>DO NOT</b> place granules in direct contact with seed as crop injury may occur  Only one application of <b>Counter 15G</b> per year may be used
<b>GRAIN SORGHUM At Planting</b>	Corn rootworms including Southern corn rootworms Wireworms White Grubs Nematodes Greenbugs	<b>Banded</b> 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	<b>Banded<sup>8</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	<sup>8</sup> <b>DO NOT</b> use banded applications for aphid control in New Mexico west Texas and the panhandle of Oklahoma  <b>DO NOT</b> graze or harvest grain sorghum forage within 50 days after treatment

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	Corn leaf aphids Chinchbugs <sup>9</sup>	Counter 15G per acre	drag chains or tines	<b>DO NOT</b> harvest grain sorghum fodder or grain within 100 days after treatment
	Greenbugs Corn leaf aphids	<b>Knifed-in</b> 7 oz per 1 000 ft of row for any row spacing (minimum 20 inch row spacing) or no more than 11 3 lbs lf <b>Counter 15G</b> per acre		<sup>9</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  <b>DO NOT</b> place granules in direct contact with seed as crop injury may occur  Only one application of <b>Counter 15G</b> per year may be used

Use Rates as Pounds per Acre* (based on various row spacing and application rates)			
Row Width (Inches)	Application Rates (oz/1,000 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

Alternate Wording when packaged in Lock n Load

#### 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 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 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 (Flute Roll Feed)	All speeds – 5 ½ Revolutions Hexagonal Nut		
White	Refer to Noble Settings		
<b>NOTE</b> These settings should be used as starting points only Continually check the amount of Counter® 15 G Systemic Insecticide Nematicide 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			

*Alternate Wording when packaged in SMARTBOX*

#### CALIBRATION INFORMATION

Please refer to the SMARTBOX operator s manual for detailed information on system operation and calibration procedures

#### LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label (b) that this product is reasonably fit for the purposes set forth in the directions for use subject to the inherent risks referred to herein when it is used in accordance with such directions and (c) that the directions warnings and other statements on this label are based upon responsible experts evaluations of reasonable tests of effectiveness of toxicity to laboratory animals and to plants and residues on food crops and upon reports of field experience Tests have not been made on all varieties of food crops and plants or in all states or under all conditions

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