

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Christopher Davis **AMVAC Chemical Corporation** 4695 MacArthur Court, Suite 1200 Newport Beach, CA 92660

Subject: Notification to Change the Primary Brand Name of EPA Registration 5481-546

Dear Mr. Davis:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 27, 2014 for:

The new primary brand name will be, Counter Technical.

The Registration Division (RD) has conducted a review of this request of applicability under PRN 98-10 and finds that the label changes(s) requested falls within the scope of PRN 98-10. The new primary brand name has bee added to our data base and the label has been datestamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Venus Eagle

Product Manager 01

Insecticide -Rodenticide Branch

Registration Division 7505P

	NOTIFICAT	ION	2,	
Please read instructions on reverse before con. ing form.	JUL 1 Ferry		Print Form /-	
SEPA Environmental Protection Washington, DC 204	on Agency	Registration Amendme Other		
Application	on for Pesticide - S	ection I		
1: Company/Product Number 5481-546	2. EPA Product Eagle	Manager	3. Proposed Classification	
4. Company/Product (Name) Counter Technical	PM# 1		X None Restricted	
5. Name and Address of Applicant (Include ZIP Code) AMVAC Chemical Corporation 4695 MacArthur Court, Suite 1200 Newport Beach, CA 92660 Check if this is a new address	į .	uct is similar or identica	e with FIFRA Section 3(c)(3) I in composition and labeling	
	Section - II			
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. (For section - Notification of change of primary brand name to Counter	Agence "Me To Other -	rinted labels in response to y letter dated po" Application. Explain below.		
	Section - III			
Material This Product Will Be Packaged In:	Section - in			
Child-Resistant Packaging Yes No * Certification must 'e submitted Unit Packaging Yes X No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging Yes No If "Yes" No. Package wgt cont	Per X P	ntainer fetal fastic ilass aper other (Specify)	
3. Location of Net Contents Information 4. Size(s) Ret X Label Container 50			accompanying product	
6. Manner in Which Label is Affixed to Product Lithog Paper Stenci	glued	Other	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
	Section - IV		O C U C J#J#J#J#J#J#J#	
Contact Point (Complete items directly below for identification)	I			
Name Christopher Davis	Title Registration Manager		lephone No. (Include Area Codo) Codo	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				
2. Signature	3. Title Registration Manager		((((((((((((((((((((
4. Typed Name Christopher Davis	5. Date 6/27/14			

June 27, 2014

Document Processing Desk (NOTIF)
Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dears Sirs:

RE: Notification of Change of Primary Brand Name Counter Technical Poison Soil Insecticide, EPA Reg. No. 5481-546

AMVAC Chemical Corporation is herein notifying the Agency that we wish to change the primary brand name of the subject product to **Counter Technical**. This is being submitted as a notification amendment per PR-Notice 98-10, Part IIA. We are also taking this opportunity to revise our contact/emergency telephone numbers and add trademark attributions; these are allowed to be made without notification, but we wanted to have them on the latest approved label.

Please find enclosed the following documents:

- 1. A completed form 8570-1
- 2. Two copies of the revised label

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please contact me at 949-221-6144.

Sincerely,

Christopher Davis, Registration Manager

20140627.cjd.us.epa Counter Technical Brand Name Revision

JUL 1 4 2014

4/

COUNTER® TECHNICAL

An Insecticide and Nematicide For Formulating Use Only

ACTIVE INGREDIENT:			By Weight
Terbufos: (S-[[(1,1-dimethylethyl)th	nio]methyl]0,0-diethyl	phosphorodithioate)	88.6%
INERT INGREDIENTS:			<u>11.4%</u>
*	TOTAL	•	100.0%

STOP! READ THE LABEL KEEP OUT OF REACH OF CHILDREN DANGER! PELIGRO! POISON *

POISONOUS BY SKIN CONTACT, INHALATION OR SWALLOWING. RAPIDLY ABSORBED THROUGH THE SKIN. REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS, PROGRESSIVELY INCREASE SUSCEPTIBILITY TO POISONING.

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.)

	FIRST AID			
	Organophosphate (a cholinesterase inhibitor)			
If swallowed	Call a poison control center or doctor immediately for treatment advice.			
	Have 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	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 in eyes	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.			
If on skin or	Take off contaminated clothing.			
clothing	Rinse skin immediately with plenty of water for 15-20 minutes.			
· ·	Call a poison control center or doctor for treatment advice.			
EMERGENCY INFORMATION Cocce				
	container or label with you when calling a poison control center or doctor, or going for treatment.			
	OWING EMERGENCIES, PHONE 24 HOURS A DAY:			
Transportation: C				
Other: AMVAC®	1-888-462-6822			

EPA Reg. No. 5481-546 EPA Est. No. 5481-MO-1 **Net Contents:**



5/ /7

NOTE TO PHYSICIAN

CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING

This product is an organophosphate which is a cholinesterase inhibitor. Warning symptoms include weakness, headache, tightness in chest, blurred vision, non-reactive pinpoint pupils, salivation, sweating, 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. Probable mucosal damage may contraindicate the use of gastric lavage. 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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER!

FATAL IF SWALLOWED, INHALED, OR ABSORBED THROUGH THE SKIN.

Wash thoroughly with soap and water after handling and before eating or smoking. Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin, or on clothing. Do not breathe dust.

Wear protective clothing, rubber gloves and goggles. Wear freshly laundered, long-sleeved work clothing. Wear a clean cap and gloves while transferring product from container to equipment. Rubber gloves should be washed with soap and water after each use. Do not wear the same gloves for other work. Destroy and replace gloves frequently.

In Case of Contact: Immediately remove contaminated clothing and wash skin thoroughly with soap and water. Launder clothing and decontaminate shoes before reuse. Bathe at the end of the work day and change clothing.

DO NOT BREATHE VAPOR

Fatal if inhaled. Wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and the National Institute for Occupational Safety under the provision of 30 CFR Part 11 for organic phosphate protection.

DO NOT CONTAMINATE FOOD OR FEED PRODUCTS

Keep all unprotected persons out of operating areas.

Keep out of reach of domestic animals.

Not for use or storage in or around the home.

DANGER - POISON PRECAUTIONS



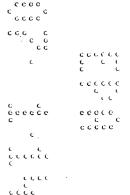
CAN WILL YOU IF SWALLOWED This product can M you I SWAKN AS IT SWALL TROUTS



CAN KLL YOU BY BRIN CONTACT The product can life your best of by with or appetration with in great or one bring flouid order through



CAN KILL YOU IF BREATHED THIS PRODUCE CAN BE YOU I FREDOM STO DIRECTION.



ENVIRONMENTAL HAZARDS

This chemical is highly toxic to aquatic organisms (fish and invertebrates) and wildlife. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National

6/7

Pollutant Discharge Elimination System (NDPES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into end-use insecticide and nematicide products intended only for non-domestic outdoor terrestrial use on field corn, popcorn, sweet corn, sugar beets and grain sorghum.

Each formulator is responsible for obtaining EPA registration for his formulated product(s).

NOTE TO FORMULATORS: Refer to Amvac Chemical Corporation's Technical Bulletin for information on the chemical, physical, and toxicological properties of COUNTER.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

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. Keep away from heat or open flame. Keep container closed. Use with adequate ventilation. Store in original container.

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: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling or reconditioning, if available, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

ATTENTION: Do not use air pressure or apply heat with open flame to remove contents of this drum.

COMBUSTIBLE

If you expect to be exposed to vapor, wear a respirator of a type approved by the National Institute for Occupational Safety & Health (NIOSH) for organic phosphate protection, such as ATX-2 respirator with Cartridge R21 and filter R 15-Wilson Products Division, Electric Storage Battery Company, Reading, PA, Farm Spray Respirator (Improved) No. 93938 with 93939 GMP filter cartridge. Mine Safety Appliance Company, 201 North Braddock Avenue, Pitsburgh, PA 15208; Glenaire Respirator GR2025 with C25 cartridge and F30 Pre-filter, Glendale Optical Company, 130 Crossways Park Drive, Woodbury, L.I., New York 11797.

SPILLS AND LEAKAGE: Isolate area and dike to prevent runoff. Wear complete protective clothing – rubber gloves, coveralls, cap, etc. Absorb spilled liquid in soda ash, clay, sweeping compound, etc. and to container for disposal, by, burial. Decontaminate area of spill.

DECONTAMINATION: Areas of leakage or spillage: Scrub with full-strength chlorine bleach solution followed by water wash. Repeat several times. Bury washes.

FIREFIGHTING: Wear impervious clothing and self-contained breathing apparatus. EVACUATE people downwind of fire. Avoid working downwind of fire. Avoid heavy hose streams. HOT CONTAINERS MAY EXPLODE. Keep a safe distance from fire in which these are present. Dike area of fire to prevent pesticide runoff. Decontaminate area before reuse.

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.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. TO THE EXTENT

7/7

CONSISTENT WITH APPLICABLE LAW THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW MANUFACTURER OR SELLER SHALL NOT BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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