

5481-562

4/20/2009

1/17



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

APR 20 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Kaila Moran  
Amvac Chemical Corporation  
4695 MacArthur Court, Suite 1250  
Newport Beach, CA 92660

Subject: Notification of the Alternate Brand Name Change

Dear Ms. Moran:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated March 27, 2009 for:

**EPA Registration 5481-562**

**Counter 20G**

**Counter 20g Smartbox (alternate brand name)**

**Counter 20G Lock 'n Load (alternate brand name)**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 finds that the label change(s) requested falls within the scope of PRN- 98-10. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, at 703 305-5409 or electronically at [daniel.dani@epa.gov](mailto:daniel.dani@epa.gov)

Sincerely,


A handwritten signature in black ink, appearing to be "ds/".

Dani Daniel  
Registration Division (7505P)  
Insecticide/Rodenticide Branch

# NOTIFICATION

EPA Form 8570-1 (Rev. 3-94) Previous edition, are obsolete. Please read instructions on reverse before completing form.

EPA File Copy (original) Yellow - Applicant Copy Form Approved, OMB No. 2070-0060, Approval expires 2-28-95

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
	<b>Application for Pesticide - Section I</b>		

1. Company/Product Number 5481-562	2. EPA Product Manager Marilyn Mautz	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Counter 20G	PM# Team 1	
5. Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4695 MacArthur Court, Suite 1250 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 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

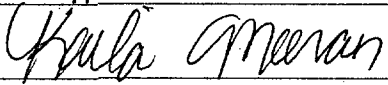
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

**Notification of an Alternate Brand Name (ABN):** Counter 20G Lock 'n Load will be an Alternate Brand Name for Counter 20G (EPA Reg. No. 5481-562) 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 the 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.

**Section - III**

2. 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 * Certification must be submitted	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 40, 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 type="checkbox"/> Lithographed <input checked="" 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 Kaila Moran	Title Product Manager	Telephone No. (Include Area Code) 949-221-6109
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.		8. Date Application Received (Stamped)
2. Signature 	3. Title Product Manager	
4. Typed Name Kaila Moran	5. Date 27-Mar-2009	



3/3

27 March 2009

Ms. Marilyn Mautz  
Document Processing Desk  
Office of Pesticide Programs (7508C)  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 S. Crystal City  
Arlington, VA 22202

**Subject: Notification of Alternate Brand Names (ABN) for:  
Counter 20G (EPA Reg. No. 5481-562)  
Counter 20G SmartBox (Alternate Brand Name)  
Counter 20G Lock 'n Load (Alternate Brand Name)**

Dear Marilyn:

Please find enclosed the notification of the Alternate Brand Names, Counter 20G SmartBox and Counter 20G Lock 'n Load, for Counter 20G (EPA Reg. No. 5481-562).

In support of this notification, please find the following documents enclosed:

- Application for Pesticide Registration (EPA Form 8570-1) for each Notification.
- Labeling for the Alternate Brand Name, Counter 20G SmartBox (Ref. No. 562-20090327r1 ABN Counter 20G SmartBox).
- Labeling for the Alternate Brand Name, Counter 20G Lock 'n Load (Ref. No. 545-20090327r1 ABN Counter 20G LockNLoad).

If you have any questions or require additional information, please do not hesitate to contact me at 949-221-6108 or email [kailam@amvac-chemical.com](mailto:kailam@amvac-chemical.com). Thank you for your attention to this matter.

Best regards,

A handwritten signature in black ink, appearing to read "Kaila Moran".

Kaila Moran  
Product Manager

20090327kmm01.terb.us

4/12

**NOTIFICATION**

**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® 20G LOCK'n LOAD**

**SYSTEMIC INSECTICIDE - NEMATICIDE**

*Alternate Wording when packaged in LOCK'N LOAD* **LOCK'n LOAD® CLOSED LOADING SYSTEM**

*Alternate Wording when packaged in SMARTBOX* **SMARTBOX® CLOSED LOADING SYSTEM**

FOR USE IN FIELD CORN (including FIELD CORN containing in-plant corn rootworm protection traits, such as YieldGard®, Herculex® and Agrisure® traits), FIELD CORN GROWN FOR SEED, POPCORN, SWEET CORN, SUGAR BEETS, AND GRAIN SORGHUM

<b>ACTIVE INGREDIENT:</b>		<b>By Weight</b>
Terbufos: S-[[[(1,1-dimethylethyl)thio]methyl]0,0diethyl phosphorodithioate.....		20.0%
<b>INERT INGREDIENTS:</b> .....		80.0%
	<b>TOTAL</b>	<b>100.0%</b>

EPA Reg. No. 5481-562

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 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>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• <b>DO NOT</b> induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• <b>DO NOT</b> give anything by mouth to an unconscious person.</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
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>	
Transportation: CHEMTREC.....	1-800-424-9300
Other: AMVAC.....	1-323-264-3910

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



4100 E. Washington Boulevard  
Los Angeles, CA 90023  
1-323-264-3910 . www.amvac-chemical.com

5/12

### 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. 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
- Protective eyewear

6/12

**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, 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: 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.**

7/12

## 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.

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## DIRECTIONS FOR USE

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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.

### 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.

8/12

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

**DO NOT** apply more than one application per year for each of the listed crops.

Crops	Pests Controlled	Rate of Counter® 20G Systemic Insecticide Nematicide	Application	Remarks
<p><b>FIELD CORN</b> ( including <b>FIELD CORN</b> containing in-plant corn rootworm protection traits, such as <b>YieldGard®</b>, <b>Herculex®</b> and <b>Agrisure®</b> traits), <b>FIELD CORN GROWN FOR SEED, POPCORN AND SWEET CORN</b> At Planting</p>	<p>Corn Rootworms<sup>1</sup> Wireworms White Grubs Seedcorn Maggots Seedcorn Beetles Corn Flea Beetles Grape Colaspis Maize Billbugs Southern Corn Billbugs Thrips Symphylans Chinchbugs<sup>2</sup> Nematodes<sup>3</sup>: Lance Lesion Root Knot Spiral Stunt Sting Stubby root Dagger <b>Suppression of:</b> Cutworms<sup>4</sup> Lesser Cornstalk Borers</p>	<p><b>Banded or In-Furrow</b> 4.5 to 6<sup>1,3</sup> oz. per 1,000 ft. of row for any row spacing. <b>DO NOT</b> exceed 6.5 pounds of <b>Counter 20G</b> per acre.</p>	<p><b>Banded</b> Place granules in a 4 to 5-inch band over the open seed furrow, in front of the presswheel and incorporate evenly into the top 1 inch of the soil.</p> <p><b>In-Furrow</b> Place granules directly into the open seed furrow behind the planter shoe, so that granules are completely covered with soil.</p>	<p>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.</p> <p>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.</p> <p><sup>1</sup>Counter 20G at 6 oz per 1,000 ft. of row controls species of corn rootworm larvae including Southern, Northern, Western, and Mexican corn rootworms. Rates less than 6 oz per 1,000 ft of row are recommended for suppression only, unless used in combination with a corn hybrid containing in-plant corn rootworm protection traits.</p> <p><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.</p> <p><sup>3</sup>Counter 20G at 6 oz per 1,000 ft. of row controls the listed nematode species. Rates less than 6 oz per 1,000 ft. of row are recommended for suppression only.</p> <p><sup>4</sup>Under heavy cutworm infestations, it may be necessary to apply a rescue treatment with an insecticide such as Ambush® or Discipline® 2EC after corn emergence to control surviving cutworm larvae.</p> <p><b>If application is made at planting, do not make postemergence or cultivation time treatments of Counter 20G</b></p> <p>ALS-inhibiting herbicides* SHOULD NOT be used if <b>Counter 20G</b> has been</p>



9/12

				<p>applied to corn at the time of planting. See additional information for "at cultivation" applications.</p> <p><b>DO NOT</b> graze or cut for forage within 30 days of treatment.</p>
<p><b>Postemergence Incorporated (Same as crops above)</b></p>	<p>Maize billbugs Southern corn billbugs</p>	<p><b>Banded</b> 6 oz. per 1,000 ft. of row for any row spacing. <b>DO NOT</b> exceed 6.5 pounds of <b>Counter 20G</b> per acre.</p>	<p>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>	<p><b>Only one at-planting, postemergence incorporated, or cultivation-time treatment of Counter 20G may be used on field corn and field corn grown for seed, popcorn, and sweet corn.</b></p> <p>Consult your state experiment station, state extension service or certified pest management specialist for proper timing of application.</p> <p><b>DO NOT</b> harvest sweet corn within 60 days after application.</p> <p><b>DO NOT</b> graze or cut for forage within 30 days of treatment.</p>
<p><b>FOR FIELD CORN ONLY (Excluding Field Corn Grown For Seed) At Cultivation</b></p>	<p>Corn rootworms</p>	<p>6 oz. per 1,000 ft. of row for any row spacing. <b>DO NOT</b> exceed 6.5 pounds of <b>Counter 20G</b> per acre.</p>	<p>Apply granules to base of plants just ahead of cultivation shovels so as to cover granules with soil.</p>	<p><b>DO NOT</b> graze or cut for forage within 30 days of treatment.</p> <p><b>Counter 20G</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<sup>®</sup> Plus, Lightning<sup>®</sup>, Northstar<sup>®</sup> and Spirit<sup>®</sup> herbicides.

Crops	Pests Controlled	Rate of Counter <sup>®</sup> 20G Systemic Insecticide Nematicide	Application	Remarks
<b>ONLY ONE APPLICATION OF COUNTER 20G PER YEAR MAY BE MADE FOR SUGAR BEETS.</b>				
<p><b>SUGAR BEETS At Planting</b></p>	<p>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> Crown borer</p>	<p><b>Banded or Modified In-Furrow</b> 3-6 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 9.8 lbs. of <b>Counter 20G</b> per acre.</p>	<p><b>Modified In-Furrow</b> Apply in-furrow at planting time 2-3 inches behind the seed drop zone after some soil has covered the seed.</p>	<p><b>At Planting</b> <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 inches.</p> <p><sup>5</sup>If especially heavy infestations are expected, use the 6 oz. rate.</p>
	<p><b>Suppression of: Cutworms</b></p>	<p><b>Banded</b> 6 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 9.8</p>	<p><b>Banded</b> Apply in 5 to 7 inch band over the row and lightly incorporate into the soil with drag chains or tines.</p>	<p><sup>6</sup>Modified in-furrow only at the 8 oz. rate.</p> <p><b>DO NOT</b> harvest sugar beets or feed tops to livestock within 150 days of a knifed-in application</p>

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		lbs. of Counter 20G per acre.		
	<b>Suppression of:</b> Sugar beet cyst nematode <b>Control of:</b> Sugar beet leafhopper Aphids	<b>Knifed-in</b> 6 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 9.8 lbs. of Counter 20G 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</b> <b>Postemergence</b>	Sugar beet root maggots Sugar beet leafhopper Aphid Sugar beet root aphid Crown borer <sup>7</sup>	<b>Banded</b> 3-6 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.  <sup>7</sup> Postemergence – apply Counter 20G at the first sign of crown borer infestation.
<b>ONLY ONE APPLICATION OF COUNTER 20G PER YEAR MAY BE MADE FOR GRAIN SORGHUM.</b>				
<b>GRAIN SORGHUM</b> <b>At Bedding</b>	Greenbugs Corn leaf aphids	<b>Knifed-in</b> 5.2 oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 8.4 lbs. of Counter 20G 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.  <b>DO NOT</b> graze or harvest grain sorghum forage within 50 days after treatment.  <b>DO NOT</b> harvest grain sorghum fodder or grain within 100 days after treatment.
<b>GRAIN SORGHUM</b> <b>At Planting</b>	Corn rootworms including: Southern corn rootworms Wireworms White Grubs Nematodes Greenbugs Corn leaf aphids Chinchbugs <sup>9</sup>	<b>Banded</b> 5.2oz. per 1,000 ft. of row for any row spacing (minimum 20 inch row spacing) or no more than 8.4 lbs. of Counter 20G per acre.	<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 drag chains or tines.	<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.  <b>DO NOT</b> harvest grain sorghum fodder or grain within 100 days after treatment.  <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.
	Greenbugs Corn leaf aphids	<b>Knifed-in</b> 5.2 oz. per 1,000 ft. of row for any row spacing (minimum 20		<b>DO NOT</b> place granules in direct contact with seed as crop injury may occur.  <b>DO NOT</b> graze or harvest grain

11  
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		inch row spacing) or no more than 8.4 lbs. of Counter 20G per acre.		sorghum forage within 50 days after treatment.  <b>DO NOT</b> harvest grain sorghum fodder or grain within 100 days after treatment.
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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)		
	3 oz.	4 oz.	6 oz.
40"	2.5	3.3	4.9
38"	2.6	3.4	5.2
36"	2.7	3.6	5.4
34"	2.8	3.9	5.6
32"	3.1	4.1	6.1
30"	3.3	4.4	6.5
28"	3.5	4.7	7.1
26"	3.8	5.0	7.6
24"	4.1	5.4	8.2
22"	4.5	5.9	8.9
20"	4.9	6.5	9.8

\*See directions for specific use rates on each crop.

**CALIBRATION INFORMATION**

Alternate Wording when packaged in Lock'n Load:

It is important that applicator equipment be properly set to deliver the labeled rate. Please refer to planter manufacturer for detailed information on appropriate gauge settings and calibration procedures.

Alternate Wording when packaged in SMARTBOX:

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

**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'n LOAD:

**CONTAINER DISPOSAL:** 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.

**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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12  
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