11/17/2010

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



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

NOV 17 2010

Joy Paff Regulatory Assistant AMVAC 4695MacArthur Court, Suite 1250 Newport Beach, CA 92660

Subject: Submission of amended labeling EPA Reg. No. 5481-562 Submissions dated September 13, 2010

Dear Ms. Paff:

The proposed labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you submit two copies of your final printed label before you release the product for shipment. Products shipped after 18 months from the date of this amendment or the next printing of the label which ever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

A stamped copy is enclosed for your records. If you have any questions, please contact Marianne Lewis at (703) 308-8043 or <u>lewis.marianne@epa.gov</u>.

Regards,

enus Euge

Venus Eagle Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

1

#### **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> 20G

SYSTEMIC INSECTICIDE - NEMATICIDE

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

#### **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. 5481-562

#### EPA Est. No.

**By Weight** 

## **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)

|                          | (If you do not understand the label, find someone to explain it to you in detail.)                           |
|--------------------------|--|
|                          | FIRST AID  |
|                          | Organophosphate (a cholinesterase inhibitor)   |
| (                        | CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING   |
| If swallowed             | 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 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 ambulance, then give artificial respiration, preferably            |
|                          | mouth to mouth if possible.  |
|                          | Call a poison control center or doctor for further treatment advice.   |
| If on skin or            | Take off contaminated clothing.  |
| clothing                 | <ul> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>                           |
| 000000-8                 | <ul> <li>Call a poison control center or doctor for treatment advice.</li> </ul>                             |
| If in eyes               | Hold eye open and rinse slowly and gently with water for 15-20 minutes.                                      |
| <b>AA FFF</b> - <b>J</b> | <ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul> |
|                          | <ul> <li>Call a poison control center or doctor for treatment advice.</li> </ul>                             |
| Repeated inhalatic       | on or skin contact may, without symptoms, progressively increase susceptibility to poisoning. Antidote:      |
| Atropine is an anti      |  |
| <u> </u>                 | EMERGENCY INFORMATION  |
| Have the product of      | container or label with you when calling a poison control center or doctor, or going for treatment. Call a   |
|                          | ses of suspected poisoning. If warning symptoms appear, keep patient prone and quiet. Start artificial       |
|                          | iately if patient is not breathing. Transport the patient immediately to the nearest hospital.               |
|                          | DWING EMERGENCIES, PHONE 24 HOURS A DAY:   |
|                          | HEMTREC1-800-424-9300  |
| Other: AMVAC             |  |
| See inside for PRECA     | UTIONARY STATEMENTS, DIRECTIONS FOR USE and LIMITED WARRANTY AND DISCLAIMER.                                 |
|                          | AMVAC ACCEPTED   |
|                          | 4100 E. Washington Boulevard   |
|                          | Los Angeles, CA 90023  |
|                          |  |
|                          |  |
|                          | Fungicide, and Rodenticide Act<br>as amended, for the pesticide  |
|                          | Registered under 5481-562  |
|                          | 14 M - 202   |

 $(\mathcal{A}, \mathcal{A}_{p}) \stackrel{\mathrm{def}}{\to} (\mathcal{A}, \mathcal{A}_{p}) \stackrel{\mathrm{def}}{\to} (\mathcal{A}, \mathcal{A}_{p})$ W. Ash

Page 1 of 9

**BPA** Reg. No.

#### 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.

Keep Out of Reach of Domestic Animals.

#### 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

. المراجع المراجع الم

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

562-201011016r5 Counter 20G per EPA 11-02-2010

**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 exist, 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<sup>®</sup> <u>Alternate Wording when packaged in SMARTBOX</u>: SMARTBOX<sup>®</sup>) that meets the definition of a closed loading system in the Worker Protection Standard for Agricultural Pesticides [40 CFR 170.240(d)(4)]. In addition to wearing the required PPE specified above for loaders must be provided, must have immediately available, and must wear in case of a broken package, spill or equipment breakdown: coveralls, chemicalresistant 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.

#### **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 and weather 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, either 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.

<u>Alternate Wording when packaged in SMARTBOX</u>: 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 REI is increased to **72** hours in 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 made of any waterproof materials
- 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.

#### PRECAUTIONS AND RESTRICTIONS

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

- Do not contaminate food or feed products.
- Not for use or storage in or around home.
- Keep out of reach of Domestic Animals.
- 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 statements for further instructions.

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.

#### AGRICULTURAL USE TABLE

| Crops                     | Pests Controlled                         | Rate of                                | Application                          | Remarks  |
|---------------------------|--|--|--------------------------------------|--|
|                           |  | Counter <sup>®</sup> 20G               |                                      | · · ·  |
|                           |  | Systemic                               |                                      |  |
|                           |  | Insecticide                            |                                      |  |
| FILL D. CODV              |  | Nematicide                             |                                      |  |
| FIELD CORN                | Corn Rootworms <sup>1</sup><br>Wireworms | Banded or In-                          | Banded                               | For use on conventional, conservation,   |
| ( including<br>FIELD CORN | White Grubs                              | <b>Furrow</b> 4.5 to $6^{1,3}$ oz. per | Place granules in a 4 to 5-inch band | or no-till corn. In situations where crop<br>debris or winds can prevent proper    |
| containing in-            | Seedcorn Maggots                         | 1,000 ft. of row                       | over the open seed                   | placement of granules, in-furrow   |
| plant corn                | Seedcorn Beetles                         | for any row                            | furrow, in front of                  | applications are recommended. In-  |
| rootworm                  | Corn Flea Beetles                        | spacing.                               | the presswheel and                   | furrow applications reduce the   |
| protection                | Grape Colaspis                           | DO NOT exceed                          | incorporate evenly                   | potential for insecticide runoff   |
| traits, such as           | Maize Billbugs                           | 6.5 pounds of                          | into the top 1 inch                  | resulting from excessive rain.   |
| YieldGard®,               | Southern Corn                            | Counter 20G per                        | of the soil.                         |  |
| Herculex® and             | Billbugs                                 | acre.                                  |                                      | Adjust the presswheel so that the  |
| Agrisure®                 | Thrips                                   |  | In-Furrow                            | closed seed furrow is higher than the  |
| traits),                  | Symphylans                               |  | Place granules                       | surrounding soil to reduce the potential   |
| FIELD CORN                | Chinchbugs <sup>2</sup>                  | ĺ                                      | directly into the                    | for insecticide run-off resulting from   |
| GROWN FOR                 | Nematodes <sup>3</sup> :<br>Lance        | Г                                      | open seed furrow                     | excessive rain.  |
| SEED,                     | Lance                                    |  | behind the planter<br>shoe, so that  | <sup>1</sup> Counter 20G at 6 oz per 1,000 ft. of                                  |
| POPCORN<br>AND SWEET      | Root Knot                                |  | granules are                         | row controls species of corn rootworm  |
| CORN                      | Spiral                                   |  | completely                           | larvae including Southern, Northern,   |
| At Planting               | Stunt                                    |  | covered with soil.                   | Western, and Mexican corn  |
| At I lanting              | Sting                                    |  |                                      | rootworms. Rates less than 6 oz per  |
|                           | Stubby root                              |  |                                      | 1,000 ft of row are recommended for  |
|                           | Dagger                                   |  |                                      | suppression only, unless used in   |
|                           | Suppression of:                          |  |                                      | combination with a corn hybrid   |
|                           | Cutworms <sup>4</sup>                    |  |                                      | containing in-plant corn rootworm  |
|                           | Lesser Cornstalk<br>Borers               |  |                                      | protection traits.   |
|                           | Dorors                                   |  |                                      | <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.  |
|                           |  |  |                                      | 30   |
|                           |  |  |                                      | <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.  |
|                           |  |  |                                      |  |
|                           |  |  |                                      | <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.  |
|                           |  |  |                                      | If application is made at planting de  |
|                           |  |  |                                      | If application is made at planting, do not make postemergence or                   |
| L                         |  | 1                                      | L                                    | not make postemergence or  |

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

6/10

| Postemergence<br>Incorporated<br>(Same as crops<br>above) | Maize billbugs<br>Southern corn<br>billbugs | <b>Banded</b><br>6 oz. per 1,000 ft.<br>of row for any<br>row spacing. <b>DO</b><br><b>NOT</b> exceed 6.5<br>pounds of<br><b>Counter 20G</b> per<br>acre. | Apply in a 7 inch<br>band over the row<br>of seedling corn<br>plants when<br>billbugs or<br>damage are<br>observed, usually<br>in the 1 to 6 leaf<br>stage of growth.<br>Use cultivators or<br>other suitable<br>implement to<br>lightly incorporate<br>granules into soil. | <ul> <li>cultivation time treatments of<br/>Counter 20G</li> <li>Restriction: ALS-inhibiting<br/>herbicides* SHOULD NOT be used if<br/>Counter 20G has been applied to corn<br/>at the time of planting. See additional<br/>information for "at cultivation"<br/>applications.</li> <li>Restriction: DO NOT graze or cut for<br/>forage within 30 days of treatment.</li> <li>Only one at-planting, postemergence<br/>incorporated, or cultivation-time<br/>treatment of Counter 20G may be<br/>used on field corn and field corn<br/>grown for seed, popcorn, and sweet<br/>corn.</li> <li>Consult your state experiment station,<br/>state extension service or certified pest<br/>management specialist for proper<br/>timing of application.</li> <li>Restriction: DO NOT harvest sweet<br/>corn within 60 days after application.</li> </ul> |
|---|---|---|---|---|
|   |   |   |   | <b>Restriction: DO NOT</b> graze or cut for forage within 30 days of treatment.   |
| FOR FIELD   | Corn rootworms                              | 6 oz. per 1,000 ft.   | Apply granules to   | Restriction: DO NOT graze or cut for  |
| CORN ONLY   |   | of row for any  | base of plants just<br>ahead of   | forage within 30 days of treatment.   |
| (Excluding<br>Field Corn                                  |   | row spacing. DO<br>NOT exceed 6.5   | cultivation shovels   | Counter 20G may be applied 7 days   |
| Grown For   |   | pounds of   | so as to cover  | after application of ALS-inhibiting   |
| Seed)   |   | Counter 20G per   | granules with soil.   | herbicides*.  |
| At Cultivation  |   | acre.   | Brandies with 3011.   | neroieides .  |
| ALCUILIVATION   |   |   | <u> </u>  | mat <sup>®</sup> Damit <sup>®</sup> Securican III <sup>®</sup> Calabrit. <sup>®</sup>   |

\*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<br>Counter <sup>®</sup> 20G<br>Systemic<br>Insecticide<br>Nematicide  | Application  | Remarks   |
|----------------------------|--|---|--|---|
| ONLY ON                    | E APPLICATION C  | F COUNTER 20G   | PER YEAR MAY B   | E MADE FOR SUGAR BEETS.   |
| SUGAR BEETS<br>At Planting | Sugar beet root<br>maggots <sup>5</sup><br>Sugar beet<br>leafhopper <sup>6</sup><br>Aphids <sup>6</sup><br>Wireworms <sup>5</sup><br>White Grubs <sup>5</sup><br>Crown borer | Banded or<br>Modified In-<br>Furrow<br>3-6 oz. per 1,000<br>ft. of row for any<br>row spacing<br>(minimum 20<br>inch row<br>spacing) or no<br>more than 9.8<br>lbs. of Counter<br>20G per acre. | Modified In-<br>Furrow<br>Apply in-furrow at<br>planting time 2-3<br>inches behind the<br>seed drop zone<br>after some soil has<br>covered the seed. | At Planting<br>Restriction: DO NOT place granules<br>in direct contact with the seed or crop<br>injury may occur. Power incorporation<br>may be used.<br>Restriction: DO NOT incorporate<br>deeper than 2 inches.<br><sup>5</sup> If especially heavy infestations are<br>expected, use the 6 oz. rate. |
|                            | Suppression of:<br>Cutworms  | <b>Banded</b><br>6 oz. per 1,000<br>ft. of row for any  | <b>Banded</b><br>Apply in 5 to 7<br>inch band over the   | <sup>6</sup> Modified in-furrow only at the 6 oz. rate.   |

|                       | ~  | row spacing<br>(minimum 20<br>inch row<br>spacing) or no<br>more than 9.8<br>lbs. of <b>Counter</b><br>20G per acre. | row and lightly<br>incorporate into the<br>soil with drag<br>chains or tines. | <b>Restriction: DO NOT</b> harvest sugar<br>beets or feed tops to livestock within<br>150 days of a knifed-in application   |
|-----------------------|--|--|---|---|
|                       | Suppression of:                            | Knifed-in  | Knifed-In   |   |
|                       | Sugar beet cyst<br>nematode                | 6 oz. per 1,000<br>ft. of row for any  | Drill granules 2<br>inches to the side  |   |
|                       | Control of:                                | row spacing  | of the seed and 2 to  |   |
|                       | Sugar beet                                 | (minimum 20  | 4 inches below the  |   |
|                       | leafhopper                                 | inch row   | seed.   |   |
|                       | Aphids                                     | spacing) or no more than 9.8   |   |   |
|                       |  | lbs. of Counter  |   |   |
|                       |  | 20G per acre.  |   |   |
| SUGAR BEETS           | Sugar beet root                            | Banded   | Banded  | Postemergence   |
| Postemergence         | maggots<br>Sugar beet                      | 3-6 oz. per 1,000<br>ft. of row for any  | Apply in 5 to 7<br>inch band over the   | For sugar beet root maggot control apply at the time of first fly emergence.  |
|                       | leafhopper                                 | row spacing  | row and lightly   | appry at the time of first fry emergence.   |
|                       | Aphid                                      | (minimum 20-   | incorporate into the  | Restriction: DO NOT harvest sugar   |
|                       | Sugar beet root<br>aphid                   | inch row   | soil with cultivation shovels   | beets or feed tops to livestock within  |
|                       | Crown borer <sup>7</sup>                   | spacing).  | or other suitable   | 110 days after at planting banded, at planting modified in-furrow or  |
|                       |  |  | implement.  | postemergence banded applications.  |
|                       |  | r<br>9   |   | <sup>7</sup> Postemergence – apply Counter 20G<br>at the first sign of crown borer<br>infestation.  |
| ONLY ONE              | APPLICATION OF                             | <b>COUNTER 20G P</b>   | ER YEAR MAY BE  | MADE FOR GRAIN SORGHUM.   |
| GRAIN                 | Greenbugs                                  | Knifed-in  | Knifed-in   | Restriction: DO NOT place granules  |
| SORGHUM<br>At Bedding | Corn leaf aphids                           | 5.2 oz. per 1,000<br>ft. of row for any  | Drill granules 1-4 inches below the   | in direct contact with seed as crop injury may occur.   |
| in bound              |  | row spacing  | seed OR 1-4 inches  |   |
|                       |  | (minimum 20  | below the seed and  | Restriction: DO NOT graze or harvest  |
|                       |  | inch row   | up to 5 inches to<br>the side of the seed.                                    | grain sorghum forage within 50 days after treatment.  |
|                       |  | spacing) or no more than 8.4   | the side of the seed.   | after treatment.  |
|                       |  | lbs. of Counter  |   | Restriction: DO NOT harvest grain   |
|                       |  | 20G per acre.  |   | sorghum fodder or grain within 100  |
| GRAIN                 | Corn rootworms                             | Banded   | Banded <sup>8</sup>   | days after treatment.<br><sup>8</sup> Restriction: DO NOT use banded  |
| SORGHUM               | including:                                 | 5.2oz. per 1,000   | Place granules in a   | applications for aphid control in New   |
| At Planting           | Southern corn                              | ft. of row for any   | 5 to 7 inch band  | Mexico, west Texas and the panhandle  |
|                       | rootworms                                  | row spacing  | directly behind the   | of Oklahoma.  |
|                       | Wireworms<br>White Crube                   | (minimum 20<br>inch row  | planter shoe in<br>front of the press   | Restriction: DO NOT graze or harvest  |
|                       |  |  | none of the press   | Restriction. DO NOT graze of harvest  |
|                       | White Grubs<br>Nematodes                   |  | wheel and lightly   | grain sorghum forage within 50 days   |
|                       | Nematodes<br>Greenbugs                     | spacing) or no<br>more than 8.4  | wheel and lightly incorporate with  | grain sorghum forage within 50 days after treatment.  |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.  |
|                       | Nematodes<br>Greenbugs                     | spacing) or no<br>more than 8.4  | incorporate with  | after treatment.<br>Restriction: DO NOT harvest grain   |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.  |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.<br><b>Restriction: DO NOT</b> harvest grain<br>sorghum fodder or grain within 100<br>days after treatment.   |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.<br><b>Restriction: DO NOT</b> harvest grain<br>sorghum fodder or grain within 100<br>days after treatment.<br><sup>9</sup> For use in the states of Alabama,   |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.<br><b>Restriction: DO NOT</b> harvest grain<br>sorghum fodder or grain within 100<br>days after treatment.   |
|                       | Nematodes<br>Greenbugs<br>Corn leaf aphids | spacing) or no<br>more than 8.4<br>lbs. of <b>Counter</b>  | incorporate with drag chains or   | after treatment.<br><b>Restriction: DO NOT</b> harvest grain<br>sorghum fodder or grain within 100<br>days after treatment.<br><sup>9</sup> For use in the states of Alabama,<br>Arkansas, Florida, Georgia, Louisiana, |

8/10

|   | Greenbugs        | Knifed-in          | Restriction: DO NOT place granules          |
|---|------------------|--------------------|---|
|   | Corn leaf aphids | 5.2 oz. per 1,000  | in direct contact with seed as crop         |
|   |                  | ft. of row for any | injury may occur.                           |
|   | 1                | row spacing        |   |
|   |                  | (minimum 20        | <b>Restriction: DO NOT</b> graze or harvest |
|   |                  | inch row           | grain sorghum forage within 50 days         |
|   |                  | spacing) or no     | after treatment.                            |
|   |                  | more than 8.4      |   |
|   |                  | lbs. of Counter    | <b>Restriction: DO NOT</b> harvest grain    |
| ÷ |                  | 20G per acre.      | sorghum fodder or grain within 100          |
|   |                  |                    | days after treatment.                       |

|           |   | ounds per Acre*<br>cing and application rates) |       |  |
|-----------|---|--|-------|--|
| Row Width | Application Rates (oz/1,000 ft. of row) |  |       |  |
| (Inches)  | 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   |  |

#### **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 and 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.

#### CONTAINER DISPOSAL:

Alternate Wording when packaged in LOCK'n LOAD:

DO NOT DISCARD THE CONTAINER. Do not attempt to open or tamper with the container. Completely empty container into application equipment. Return empty container to point of purchase or call 1-888-GO-AMVAC for instructions. Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

#### Alternate Wording when packaged in SMARTBOX:

DO NOT DISCARD THE CONTAINER. Do not attempt to open or tamper with the container. Completely empty container into application equipment. All SMARTBOX containers must be returned per instructions provided or by calling 1-888-SMARTBOX. Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

#### 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 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 TO THE EXTENT CONSISTENT WITH APPLICABLE LAW 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.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

COUNTER, LOCK'N LOAD, SMARTBOX, AMBUSH and DISCIPLINE are registered trademarks of AMVAC Chemical Corporation.

Celebrity and Lightning are registered trademarks of BASF Corporation.

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

Agrisure, Beacon, Exceed, Northstar and Spirit are registered trademarks of a Syngenta Group Company.

Herculex, Hornet and Scorpion III are registered trademarks of Dow Agrosciences LLC.

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

YieldGard is a registered trademark of Monsanto Technology LLC.

AMVAC Chemical Corporation 4100 E. Washington Blvd. Los Angeles, CA 90023 USA 1-323-264-3910 www.amvac-chemical.com