



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

JUL 16 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Frank Sobotka, Ph. D.  
Regulatory Manager  
Gharda Chemical Limited  
660 Newtown Yardley Road, Suite 106  
Newtown, PA 18940

Subject: Supplemental Label: Revised PHI, restrictions and application rates for corn (Field Corn and Sweet Corn, including Corn Grown for Seed)  
EPA Reg. No. 33658-9  
Pilot 4E Chlorpyrifos Agricultural Insecticide

Dear Dr. Sobotka:

The supplemental labeling for corn referred to above is acceptable with the following comments:

- 1) You must make the new approved supplemental label available to all distributors and users immediately. The Agency recommends that the registrant send distributors, dealers and other key end-users e-mail/letters/FAX forwarding the revised labeling and explanations for quick implementation.
- 2) Please incorporate the supplemental label changes and all the other chlorpyrifos mitigation language required by the IRED into the section 3 label. Please submit the revised section 3 label for re-registration within a month from the date of this letter by e mail and/or paper copies.
- 3) You may delete the restriction of "Do not allow meat or dairy animals to graze.....within 14 days after treatment" since the Agency has establishment tolerances for residues of corn forage and fodder at 8 ppm (180.342).

A stamped copy "accepted with comments" of the supplemental label is enclosed for your records. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Akiva Abramovitch".

Akiva Abramovitch, Ph. D.  
Insecticide/Rodenticide Branch  
Registration Division (7505P)

**RESTRICTED USE PESTICIDE**  
For retail sale to and use only by certified Applicators or persons under their direct supervision and only for those uses covered by the certified Applicator's certification.

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated: [REDACTED]

JUL 16 2007

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 33658-9

 **Gharda Chemicals Limited**

**Pilot<sup>®</sup> 4E**

**CHLORPYRIFOS AGRICULTURAL INSECTICIDE**  
EPA Reg. No. 33658-9

**SUPPLEMENTAL LABELING FOR CORN**  
**(Field Corn, Sweet Corn, and Corn Grown for Seed)**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This labeling must be in the possession of the user at the time of application. Read the label affixed to the container for Pilot 4E Insecticide before applying. Carefully follow all precautionary statements and applicable use directions. Use of Pilot 4E according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Pilot 4E.

**DIRECTIONS FOR USE**

Refer to product label for Pilot 4E for general Use Precautions, Mixing and Application instructions

**Conservation Tillage: Preplant, At-Plant, or Preemergence Applications**

Apply as a broadcast spray to surface trash and exposed soil using power-operated ground spray equipment. Use a total spray volume of 20 gpa or more. Use a higher rate in the rate range to extend residual control.

**Tank Mixing:** Pilot 4E may also be applied in tank mixtures with paraquat or glyphosate and/or liquid fertilizer solutions. See Mixing Directions section in the product label for tank mixing instructions. Read and carefully follow all applicable directions, restrictions, and precautions on labeling for each product used in combination with Pilot 4E.

Target Pests	Pilot 4E (pint/acre)
Armyworms cutworms	1 - 2

**Postemergence Application**

Apply as a postemergence broadcast spray using sufficient spray volume to ensure thorough coverage of treated plants, but no less than 15 gallons per acre (gpa) for ground spray equipment of 2 to 5 gpa for aircraft equipment. Control may be reduced at low spray volumes under high temperature and wind conditions. Pilot 4E may be tank-mixed with glyphosate products such as Glyphomax<sup>®</sup> XRT herbicide or Durango<sup>™</sup> herbicide when application is to be made to glyphosate-tolerant corn. **Note:** Do not apply aerially in Mississippi.

**Chemigation:** Pilot 4E may be broadcast applied postemergence through sprinkler irrigation systems at recommended application rates to control listed foliar pests. For best results, tank mix Pilot 4E with 2 pints of non-emulsifiable oil. See Chemigation (Sprinkler Irrigation) Section on the product label for application instructions.

Target Pests	Pilot 4E (pint/acre)
grasshoppers	1/2 - 1
aphids armyworms chinch bugs(1) corn rootworm adults(2) cutworms(3) European corn borer(5) flea beetle adults(1) southern corn leaf beetle webworms(4) Western bean cutworm	1 - 2
corn earworm Southwestern corn borer(6)	1 1/2 - 2
billbugs(1) common stalk borer(9) corn rootworm larvae(7), (8) lesser cornstalk borer	2

Numbers in parentheses refer to Pest-Specific Use Directions.

1. For best **billbug**, **chinch bug**, or **flea beetle** control, ground apply in a minimum spray volume of 20 to 40 gpa at 40 psi. If corn is less than 6 inches tall, apply in a 9 to 12 inch wide band over the row. For corn greater than 6 inches tall, apply using drop nozzles directed to the base of the plant. Do not reduce the application rate for banded or directed applications. Concentrate the full-labeled dosage rate in the treated zone. When chinch bugs continue to immigrate to corn over a prolonged period or under extreme pest pressure, a second application may be needed.
2. The recommended dosage will control silk clipping by **corn rootworm adults**.
3. For **cutworms**, it is preferable to apply Pilot 4E when soil is moist and worms are active on or near the soil surface. If ground is dry, cloddy, or crusted at time of treatment, worms may be protected from the spray and effectiveness will be reduced. Shallow incorporation using a rotary hoe or other suitable equipment immediately before or soon after treatment may improve control. A second application may be required if damage or density levels exceed economic thresholds established for your area.
4. For **webworm** control, shallow incorporation using a rotary hoe or other suitable equipment immediately before or soon after treatment is necessary.
5. For **European corn borer** control, use 1 1/2 to 2 pints per acre when application is made with power-operated ground and aerial equipment or 1 to 2 pints per acre when application is made through a sprinkler irrigation system. University research indicates that achieving greater than 50% control of first-generation European borer with a single liquid insecticide treatment is highly dependent upon timing, insecticide placement, and weather conditions.
6. For **southwestern corn borer**, a second application may be applied 21 days later if needed due to reinfestation.
7. For postemergence control of **corn rootworm larvae** apply at cultivation. Direct the spray to both sides of the row at the base of the plants just ahead of the cultivator shovels. Cover the insecticide with soil around the brace roots. A cultivation application of Pilot 4E may be made in addition to and at-planting application of Pilot 15G insecticide.
8. Pilot 4E may also be applied through sprinkler irrigation systems at the rate of 2 pints per acre to control **corn rootworm larvae**. Time application to coincide with the appearance of the second instar larvae. Apply with enough water to wet the root zone to the depth control needed. If soils are wet, allow enough soil drying to occur such that an application using a minimum amount of water will not produce surface runoff. See Chemigation (Sprinkler Irrigation) section for application instructions.
9. Do not use Pilot 4E in combination with a burndown herbicide for control of common stalk borer. For **common stalk borer** control, treat approximately 11 days after application of glyphosate or after burndown with paraquat herbicide is complete (3 to 5 days).

**Specific Use Restrictions:**

- **Worker Restricted Entry Interval:** Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours unless PPE required for early entry is worn.
- **Preharvest Interval:** Do not apply within 21 days before harvest of grain or ears.
- Do not allow meat or dairy animals to graze in treated areas nor harvest treated corn silage as feed for meat or dairy animals within 14 days after last treatment.
- Do not apply more than 6 pints of Pilot 4E (3 lbs ai chlorpyrifos) per acre per season.
- Do not make more than 3 applications of any product containing chlorpyrifos per season, including the maximum allowed of 2 granular applications, at the 1 lb ai chlorpyrifos rate.
- Do not make a second application of Pilot 4E or other product containing chlorpyrifos within 10 days of the first application.
- Maximum single application rate is 2 pints of Pilot 4E (1 lb ai chlorpyrifos) per acre.
- Do not apply in tank mixes with Steadfast or Lightning herbicides.
- If more than 1 lb ai granular chlorpyrifos per acre is applied at-plant (for a maximum of 1.3 lb ai per acre per season), only 1 additional application of a liquid product containing chlorpyrifos at 1 lb ai per acre is allowed per season, for a total of 2.3 lb ai chlorpyrifos per acre per season.

Manufactured by:  
Gharda Chemicals Limited  
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Suite 106  
Newtown, PA 18940

EPA Accepted:

Pilot® is a registered trademark of Gharda Chemicals Limited