



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. 33658-10
Pilot 15G 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).
- 4) For clarity add at the end of the restriction "Re-treatment with a second soil application..... is allowed under replant situation.....**only when initially applied at the rate of 1 lb.**

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. Chemist
Insecticide/Rodenticide Branch
Registration Division (7505P)

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

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[®] 15G

CHLORPYRIFOS AGRICULTURAL INSECTICIDE

EPA Reg. No. 33658-10

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

ATTENTION

- 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 15G before applying.
- Carefully follow all precautionary statements and applicable use directions.
- Use of Pilot 15G according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Pilot 15G.

DIRECTIONS FOR USE

Refer to product label for additional Precautionary Statements, Mixing and Application instructions.

Pilot 15G insecticide is compatible with all ALS inhibitor herbicides, including Accent and Beacon herbicides, applied in accordance with label recommendations.

At Plant T-Band Application: Apply 8 oz of Pilot 15G per 1000 ft of row as a T-band over an open seed furrow over the row behind the planter shoe, in front of the press wheel. In conventional and minimum-till corn, incorporate into the top ½ to 1 inch of soil using suitable equipment. A soil applied T-band treatment may be followed by post-applied herbicides. Pilot 15G has demonstrated suppression of certain soil-borne pathogens that may result in physiological and agronomic advantages to corn under environmental stress conditions when compared to corn not treated with Pilot 15G.

At Plant In-Furrow Application: Apply 8 oz of Pilot 15G per 1000 ft of row at planting as an in-furrow treatment in conventional, minimum and no-till corn. Direct the granules into the planter shoe with the seed, or place the applicator tube directly behind the planter shoe so that the granules drop into the seed furrow, or place the granular band applicator behind the planter shoe so that the granules fall on the soil surface and into the open seed furrow and are covered with soil.

Postplant Application: To control corn rootworm larvae, apply 8 oz of Pilot 15G per 1000 ft of row at cultivation by placing the granules at the base of the plant on both sides of the row just ahead of the cultivation shovels and covering the granules with soil. To control European and southwestern corn borer larvae, apply Pilot 15G in a band over the row so that the granules are directed into the whorl or use a postplant broadcast treatment. Consult your state agricultural experiment station or extension service specialist for proper time to treat and local threshold information. Scouting for insect damage is strongly encouraged.

Postplant Broadcast Treatment: To control European and southwestern corn borers, apply Pilot 15G by uniformly broadcasting the granules over the corn plants by aerial application or by applying the granules into the corn whorls by ground application. For aerial applications, do not apply within 150 feet of rivers, natural ponds, lakes, streams, reservoirs, marshes, estuaries and commercial fishponds. Apply at a rate of 5 lb per acre for low to moderate first generation infestations or at 6.5 lb per acre for severe first generation infestations and all second generation infestations. Apply before larvae have entered corn stalks. Consult your state agricultural experiment station or extension service specialist for local threshold information. Scouting for insect damage is strongly encouraged.

Corn Field, Sweet Corn (including corn grown for seed)*

Application Rates and Pests Controlled

Pests Controlled	Banded/in furrow Applications (Ounces per 1,000 Feet of Row)			Aerial Broadcast Application (lb/Acre)
	40-Inch Row Spacing*			
	At Plant Applications		Postplant Treatment	
	T-Band	In-Furrow		
armyworms	-	-	6 - 8	-
billbugs	8	-	-	-
Chinch bug (1)	8	8	-	-
Cutworms (1)	8	8	-	-
European and southwestern corn borer(3)				
1st Generation	-	-	3.5 to 8	5.0 to 6.5
2nd Generation	-	-	6 to 8	6.5
grubs	8	8	-	-
lesser cornstalk borer	8	-	-	-
Northern, Western and Southern corn rootworm larvae	8	8	8	-
seed corn beetle	8	8	-	-
seed corn maggots	8	8	-	-
Southern corn Rootworm larvae	8	8	8	-
symphylans	8	-	-	-
Wireworms (2)	8	8	-	-

Numbers in parentheses (-) refer to Pest-Specific Use Directions.

Pest Specific Use Directions:

1. **Cutworms, fire ants and chinch bugs:** The 8 oz rate provides suppression only for in-furrow treatments.
2. **Wireworms:** For best control, apply as an in-furrow treatment. Consider using a hopper box insecticidal seed treatment with T-band applications.
3. **European corn borer:** When using post plant banded applications, use rates of 3.5 to 4 oz of Pilot 15G per 1000 feet of row for low to moderate first generation infestations before larvae have entered corn stalks. Use application rates of 6 to 8 oz of Pilot 15G per 1000 feet of row for severe first generation infestations and all second generation infestations before larvae have entered corn stalks.

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 by aircraft at a rate greater than 1 lb ai per acre.
- Do not make more than 1 at-plant application and 1 foliar application of Pilot 15G per season at the 1 lb ai chlorpyrifos rate.
- 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. Re-treatment with a second soil application of Pilot 15G is allowed under replant situations due to loss of crop during establishment.
- Do not apply more than a total of 3 lb ai chlorpyrifos per acre per season.
- Do not make a second application of Pilot 15G or other product containing chlorpyrifos within 10 days of the first application.
- Maximum single application rate for at-plant applications is 8 oz of Pilot 15G per 1000 ft of row (1.3 lb ai chlorpyrifos per acre).
- Maximum single application rate for postplant applications is 6.5 lb of Pilot 15G (1 lb ai chlorpyrifos) per acre.
- 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