

US EPA ARCHIVE DOCUMENT



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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

14 JUN 1982

Mr. John Spinks
Chief, Office of Endangered Species
U.S. Department of the Interior
Washington, D.C. 20240

Dear Mr. Spinks

This letter confirms Bill Rabert's conversation with Earl Possert of your staff regarding the proposed registration of Counter 15G (terbufos) for use on grain sorghum and soybeans. Review of former Section 7 consultations indicated OES opinions for Thimet 20G, Carbofuran 10G, and Temik 10G, which cover one or both of these two uses. Since Thimet and Counter are almost structurally identical, their toxicity to all species are similar, and their formulation and use patterns are similar, EEB has concluded that the same geographic label restrictions should apply. It should be noted that Counter 15G was previously registered on corn prior to the initiation of EOS consultations and therefore some restrictions may relate to those corn uses as identified in the Thimet opinion. The existing Environmental Hazards statement for Counter 15G is:

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Treated granules exposed on the soil surface may be hazardous to birds and other wildlife. Keep out of any body of water. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of waste.

Current use directions direct the applicator to "Cover granules that may be exposed on the ends of the treated row and turns and loading areas by deep discing immediately after treating fields."

Along with these instructions, EEB suggests the following geographic restrictions prohibiting the use of Counter 15G. Since some inconsistencies were found in the Texas counties listed for Attwater's greater prairie chicken, the number of listed counties were reduced from 13 to the original 9 counties identified in the OES biological opinion for carbofuran to maintain consistency with earlier labeling requirements for sorghum (see attached memo). The proposed restriction is:

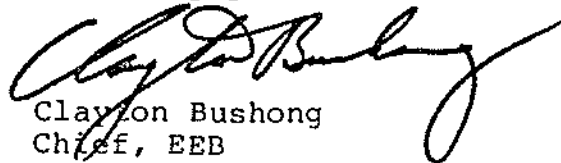
"Use of terbufos should be prohibited in the Texas counties of Aransas, Austin, Brazoria, Colorado, Goliad, Harris, Refugio,

2 pp
and
4 pp attachment

Victoria, and Waller to protect the Attwater's greater prairie chicken, and in the California counties of Butte, Colusa, Glenn, Solano, Sutter, and Yolo from mid-August through the end of December and from mid-September through mid-March in the counties of Merced, San Joaquin, and Stanislaus to protect the Aleutian Canada goose which were both identified by OES as being in jeopardy; and EOS suggested that terbufos use should be withheld from Lauderdale County, Alabama to protect the Alabama cavefish and in the Maryland counties of Dorchester, Kent, Queen Anne, and Talbot and in Accomack County, Virginia to protect the Delmarva Peninsula fox squirrel, until the potential impact on these two species is clarified."

EEB requests your concurrence on this action. Thank you.

Sincerely yours,



Clayton Bushong
Chief, EEB

Attachment

ADDENDUM TO PEER GROUP'S REVIEW OF
THE TEMIK REVIEW FOR SORGHUM

TO: Clayton Bushong, Chief
Ecological Effects Branch
Hazard Evaluation Division

PEER GROUP:

MEETING DATE: 04/28/82
DATE OF REPORT: 05/04/82
REVIEWER: Charles Bowen

- 1. Mary Gessner *MG*
- 2. Dennis McLane
- 3. Doug Urban
- 4. Richard Stevens *RS*

The purpose of this addendum is to change the first of four recommendations made by the group concerning the review of Temik's use on sorghum. The first recommendation prohibited the use of Temik on sorghum in the following eleven Texas counties:

- | | |
|---------------|------------------|
| - 1. Refugio | ✓ 7. Wallen |
| - 2. Goliad | ✓ 8. Wharton |
| - 3. Austin | - ✓ 9. Fort Bend |
| - 4. Colorado | ✓ 10. DeWitt |
| - 5. Harris | - 11. Brazoria |
| - 6. Victoria | - 12. Aransas |
| | - 13. Galveston |

> Deleted because sorghum is not currently grown there.

However, Clayton Bushong, Branch Chief, pointed out that we should adhere to the original nine counties mentioned in the Office of Endangered Species (OES) biological opinion on carbofuran for sorghum in order to remain consistent. Omissions and additions will be entertained provided OES rationale is acceptable and stable.

The following is a list of the counties recommended in the carbofuran document:

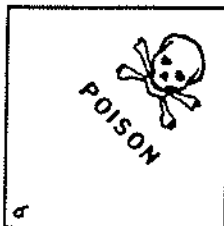
- | | |
|--------------|----------------|
| ✓ 1. Aransas | ✓ 5. Colorado |
| ✓ 2. Refugio | ✓ 6. Galveston |
| ✓ 3. Goliad | ✓ 7. Harris |
| ✓ 4. Austin | ✓ 8. Victoria |
| | ✓ 9. Brazoria |

ACCEPTED

MAY 13 1982

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 241-238

DOT-44D



DOT - E 624

Organic phosphorus compound, irritant, etc.

Counter[®] 15-G



SOIL INSECTICIDE-NEMATICIDE

FOR USE IN FIELD CORN, POPCORN, SWEET CORN AND SUGAR BEETS

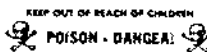


Active Ingredient:

Terbufos (S-[[(1,1-dimethylethyl)thio]methyl]O,O-diethyl) bosphorodithioate... 15.0%

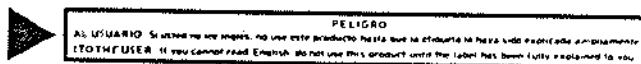
Inert Ingredients 85.0%

EPA Reg. No. 241-238



MAY BE FATAL IF SWALLOWED, INHALED OR ABSORBED THROUGH THE SKIN
RAPIDLY ABSORBED THROUGH SKIN
REPEATED INHALATION OR SKIN CONTACT MAY, WITHOUT SYMPTOMS,
PROGRESSIVELY INCREASE SUSCEPTIBILITY TO POISONING

See Back Panel For Antidote And Other Warnings



Net Weight: 50 Lbs.
22.68 kg

24696-08

D-42

LOT NO. 365 840 38A1
TRADEMARK

SOLD BY
AMERICAN CYANAMID COMPANY
AGRICULTURAL DIVISION—WAYNE, N. J. 07470

MADE AND PRINTED IN U.S.A.

SOIL INSECTICIDE-NEMATICIDE
Counter[®] 15-G

Counter[®] 15-G
SOIL INSECTICIDE-NEMATICIDE

DANGER! HAZARDS TO HUMANS AND DOMESTIC ANIMALS

- DO NOT GET IN EYES, ON SKIN, OR CLOTHING**
Wear gloves and avoid spraying clothing when applying. While transferring from package to equipment, wear a clean cap and gloves (rubber or cotton). If cotton gloves are used, they must be discarded or discarded after use. Rubbery gloves should be washed with soap and water after each use. Do not wear the same gloves for other work. Wash and replace gloves frequently.
- In case of contact, immediately remove contaminated clothing and wash skin thoroughly with soap and water. Launder clothing and decontaminate shoes before reuse. Wash thoroughly with soap and water before eating or smoking. Bathe at the end of the work day and change outer clothing.
- DO NOT BREATHE DUST**
While emptying bags into equipment, pour downward and allow as little dust as possible. Do not pour or face level and do not blow dust to reach the breathing zone.
- DO NOT CONTAMINATE FOOD OR FEED PRODUCTS**
Sweep up and bury spillage, whether it occurs indoors or in the field. Once a bag has been opened, use it completely or bury the remainder. Make sure that the hoppers of equipment are emptied when still in the field.
- Keep all unguarded persons out of operating areas.
- KEEP OUT OF REACH OF DOMESTIC ANIMALS**
- NOT FOR USE OR STORAGE IN OR AROUND THE HOME**

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Treated granules deposited on soil surface may be hazardous to birds and other wildlife. Keep out of any body of water. Do not apply where runoff is likely to occur. Do not contaminate water by cleaning of equipment or disposal of wastes.



IN CASE OF AN EMERGENCY ENDANGERING LIFE OR PROPERTY INVOLVING THIS PRODUCT, CALL COLLECT. DAY OR NIGHT, AREA CODE 251-775-3100.

WARNING: Airborne in the dust. Consult your physician about obtaining a batch of 1,140 ppm AFB₁ analysis for comparison with a laboratory analysis of the product. If the analysis shows a higher level of AFB₁, you should stop using the product immediately. Do not use the product if the analysis shows a higher level of AFB₁ than the laboratory analysis. Do not use the product if the analysis shows a higher level of AFB₁ than the laboratory analysis.

CALL A PHYSICIAN AT ONCE IN ALL CASES OF SUSPECTED POISONING

FIRST AID

IF SWALLOWED: Do not induce vomiting unless directed to do so by a physician. Do not take any laxatives. Do not induce vomiting unless directed to do so by a physician. Do not take any laxatives. Do not induce vomiting unless directed to do so by a physician. Do not take any laxatives.

IF INHALED: Move to fresh air. If breathing is difficult, give oxygen. If breathing is not difficult, give oxygen if available. If breathing is not difficult, give oxygen if available.

IF ON SKIN: Wash with soap and water. Remove contaminated clothing and shoes. Wash thoroughly with soap and water before eating or smoking. Bathe at the end of the work day and change outer clothing.

IF IN EYES: Flush eyes with water for at least 15 minutes. Get medical attention if irritation persists.

DISCLAIMER

This label is not intended to be used as a substitute for the manufacturer's instructions. The manufacturer is not responsible for any damage or injury resulting from the use of this product. The manufacturer is not responsible for any damage or injury resulting from the use of this product.

STORAGE AND DISPOSAL

Store in a cool, dry place. Do not store in a plastic bag. Do not store in a plastic bag. Do not store in a plastic bag. Do not store in a plastic bag.

DIRECTIONS FOR USE

BEFORE USING, READ PRECAUTIONARY STATEMENTS.

DO NOT FEED TO LIVESTOCK OR OTHER ANIMALS. Do not feed to livestock or other animals. Do not feed to livestock or other animals. Do not feed to livestock or other animals.

Event	Amount of Granules	Rate	Application	Remarks
FIELD CORN, SOYBEANS, AND SWEET CORN	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Wheat	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Barley	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Oats	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Alfalfa	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Hay	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Grass	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Legume	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
Other Cereals	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.

Event	Amount of Granules	Rate	Application	Remarks
Corn Sorghum	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
At Planting	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
at bedding	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.
at Planting	Granules	4.0 to 10.0 lb. per 1,000 ft. of row spacing (10-inch row spacing)	Apply granules in a 3-1/2 inch band directly behind the planter shoe in front of the drive wheel.	Do not place granules in direct contact with seed or crop injury may occur. Only one application per year may be used.

Local Application Rates for Various Row Spacings
Rate for 1,000 ft. of Row

Row Spacing	4 oz.	8 oz.	1 lb.	10 oz.	12 oz.	14 oz.	16 oz.
40"	4.0	8.0	8.5	8.7	9.8	11.4	13.1
38"	5.2	8.9	9.3	9.5	10.6	12.2	13.9
36"	5.4	7.3	7.7	7.9	8.9	10.4	12.0
34"	5.6	6.5	6.9	7.1	8.0	9.4	10.9
32"	5.8	5.7	6.1	6.3	7.1	8.4	9.8
30"	6.0	4.9	5.3	5.5	6.2	7.4	8.7
28"	6.2	4.1	4.5	4.7	5.3	6.4	7.6
26"	6.4	3.3	3.7	3.9	4.4	5.3	6.4
24"	6.6	2.5	2.9	3.1	3.5	4.3	5.1
22"	6.8	1.7	2.1	2.3	2.6	3.2	3.8
20"	7.0	0.9	1.3	1.5	1.7	2.1	2.5

CALIBRATION INFORMATION

BEFORE USING THE CALIBRATOR EQUIPMENT BE PROPERLY SET TO DELIVER THE LABELED RATE. This chart will help determine the desired rate of application.

When label rate is 8 ounces per 1,000 feet of row. Use these suggested starting gauge settings, regardless of row spacing.

Row Spacing	40"	36"	32"	28"	24"	20"
40"	10	11	12	13	14	15
36"	11	12	13	14	15	16
32"	12	13	14	15	16	17
28"	13	14	15	16	17	18
24"	14	15	16	17	18	19
20"	15	16	17	18	19	20

SUPPLEMENTAL LABELING

COUNTER® 15-G soil insecticide-nematicide
(EPA Reg. No. 241-238)

DIRECTIONS FOR USE

BEFORE USING, READ PRECAUTIONARY STATEMENTS ON BAG

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. COUNTER 15-G should be applied with a granular pesticide applicator properly calibrated to assure accurate placement and proper dosage. See label for specific instructions.

Cover granules that may be exposed on the ends of the treated rows and turns and loading areas by deep discing immediately after treating fields.

Crop	Pest Controlled	Rates	Application	Remarks
Grain Sorghum At planting	Greenbugs	<u>Banded</u> 8-16 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing)	<u>Banded</u> ^{1/} Place granules in a 5-7 inch band directly behind the planter shoe in front of the press wheel	Do not place granules in direct contact with seed as crop injury may occur. Only one application per year may be use
At bedding or At planting		<u>Knifed-in</u> 8-16 oz. per 1,000 ft. of row for any row spacing (minimum 20-inch row spacing) or no more than 26 lbs. per acre.	<u>Knifed-in</u> Drill granules 1-4 inches directly below the seed OR 1-4 inches below the seed and up to 5 inches to the side of the seed.	^{1/} Do not use banded applications in New Mexico, West Texas and the Panhandle of Oklahoma.

Rec