

US EPA ARCHIVE DOCUMENT

AWD

JB

105001
SHAUGHNESSEY NO.

22
REVIEW NO.

EEB BRANCH REVIEW

DATE: IN 9-17-84 OUT 9-19-84

FILE OR REG. NO. 241-238

PETITION OR EXP. PERMIT NO. _____

DATE OF SUBMISSION 8-27-84

DATE RECEIVED BY HED 9-14-84

RD REQUESTED COMPLETION DATE 9-26-84

EEB ESTIMATED COMPLETION DATE 9-26-84

RD ACTION CODE/TYPE OF REVIEW 451/Protocol

TYPE PRODUCT(S): I, D, H, F, N, R, S Insecticide

DATA ACCESSION NO(S) .. _____

PRODUCT MANAGER NO. W. Miller (16)

PRODUCT NAME(S) Counter

COMPANY NAME American Cyanamid Company

SUBMISSION PURPOSE Submission Of Changes In Protocol

| SHAUGHNESSEY NO. | CHEMICAL, & FORMULATION | % A.I. |
|------------------|-------------------------------|-----------|
| <u>105001</u> | <u>Counter 15G (terbufos)</u> | <u>15</u> |
| _____ | _____ | _____ |
| _____ | _____ | _____ |
| _____ | _____ | _____ |

2 pages
of attachment
9 pages



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

21 SEP 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

TO: Marilyn Mautz, PM Team (16)
Registration Division, TS-767c

THRU: Dave Coppage *Charles Leming for*
Head, Sec. 3
Ecological Effects Branch/HED

THRU: Clayton Bushong *Norman Calk for*
Chief
Ecological Effects Branch/HED

SUBJECT: Amendments to American Cyanamid's Terrestrial Field Study Protocol
for Counter 15G (Terbufos) Use on Corn. Wildlife International, Ltd.
Protocol No. 050284/P6.

EEB has received and noted the changes to the protocol (No. 050284/P6 (981-84-124) - Wildlife International, Ltd.) to study terrestrial nontarget field effects of Counter 15G (terbufos) on corn. This research is sponsored by American Cyanamid Company.

It is our understanding that the field work phase of this study is complete and that these changes are de facto protocol amendments. Thus, EEB will not comment on the acceptability of the amendments per se. We will reserve comment on the study until we are requested to review the report of this research.

John J. Bascietto

John J. Bascietto
Wildlife Biologist, Sec. 3
Ecological Effects Branch/HED, TS-769c



American Cyanamid Company
 Agricultural Research Division
 P. O. Box 400
 Princeton, NJ 08540
 (609) 799-0400

August 27, 1984

Mr. William Miller
 Product Manager (16)
 Insecticides-Rodenticides Branch
 Registration Division (TS-767)
 U.S. Environmental Protection Agency
 Crystal Mall, Building No. 2
 1921 Jefferson Davis Highway
 Arlington, Virginia 22202

Re: COUNTER[®] systemic insecticide-nematicide, EPA Reg. No. 241-238.
 Our letter May 9, 1984 with the revised protocol, "An Evaluation of the
 Effects of COUNTER 15G to Terrestrial Species Under Actual Field Use
 Conditions" (Wildlife International Ltd.).

Dear Mr. Miller:

Enclosed are three (3) copies of Amendments No. 1 to 4 and two notices of
 deviation concerning the protocol cited above. These changes relate to the
 following:

Amendment No. 1. The "control" field was omitted because of the extensive
 use of Furadan in the area, but one more test field was added. The size of the
 test fields were altered to accommodate appropriate habitat. ✓

Amendment No. 2. The person responsible for the study is now Mark Jaber and
 not Joann Beavers.

Amendment No. 3. The spacing between corn rows was changed from 20 to 30
 inches. This is standard practice in the area and in line with the banded and in-
 furrow recommendations on our main label submitted for your approval on
 August 3, 1984. X

Amendment No. 4. The title of the section, "Pre-application Monitoring", was
 changed to "Searcher Efficiency and Predator Removal". Collection efficiency
 and predator removal will be measured two to three weeks after the last
 application. This should enhance field observations and check searchers'
 efficiency.

*The searcher efficiency could be greater at
 end because of more practice throughout
 the study - look the initial efficiencies!*

*check label
 * less granules applied*

*3
 07-84*



Mr. W. Miller
COUNTER[®] systemic
insecticide-nematicide

-2-

August 27, 1984

Deviation dated May 14, 1984. The schedule on protocol pages 4 and 5 could not be followed exactly because of unfavorable weather conditions.

Deviation dated June 1, 1984. Gross necropsies were not done on dead birds during the study, because the Study Director felt that the examinations would interfere with results of the whole body tissue analyses.

Very truly yours,

AMERICAN CYANAMID COMPANY
Agricultural Research Division

A handwritten signature in cursive script, appearing to read 'Kenneth A. Sund'.

Kenneth A. Sund, Ph.D.
Registrations Coordinator
Plant Industry Registrations

KAS:sd
Enc.

[®]Registered trademark of American Cyanamid Company

Handwritten marks and numbers at the bottom right of the page, including a large '4' and some illegible scribbles.

PROTOCOL AMENDMENT

WIL Project No.: 130-135 Client: American Cyanamid

Protocol No.: 050284/P6 (981-84-124) Amendment No.: 1

Study Title: An Evaluation of the Effects of COUNTER 15G to Terrestrial
Species Under Actual Field Use Conditions

Test Material: Counter 15G

Effective Date of Amendment: 5/8/84

Original Protocol Section:

SUMMARY: COUNTER 15G will be applied at the maximum label use rate to five (5)

SITES AND TEST CONDITIONS: Five (5) test and one (1) control 20-30 acre corn fields
(Last Paragraph) The control field will closely approximate the test fields.

STUDY MONITORING: Transects will be established for each test and control field.

Amended Protocol Section:

SUMMARY: COUNTER 15G will be applied at the maximum label use rate to six (6)

SITES AND TEST CONDITIONS: Six (6) test 12-30 acre corn fields
Omit last paragraph of this section.

STUDY MONITORING: Transects will be established for each test field.

Rationale:

Because of heavy use of Furadan in the area it was felt that it would be better to do without a control field. One more test field was added in order to get a better handle on variability. The size of the test fields was altered to reflect the fields available with appropriate habitat.

Amendment Reviewed and Accepted:

Client Principal Investigator: *W. Kelly* Date: 8/15/84

WIL Study Director: *Mark John* Date: 7/30/84

WIL Management: *Mark John* Date: 7/30/84

PROTOCOL AMENDMENT

WIL Project No.: 130-135 Client: American Cyanamid

Protocol No.: 050284/P6 (981-84-124) Amendment No.: 3

Study Title: An Evaluation of the Effects of COUNTER 15G to Terrestrial
Species Under Actual Field Use Conditions

Test Material: Counter 15G

Effective Date of Amendment: 5/8/84

Original Protocol Section:

AGRICULTURAL PRACTICES: (last sentence) Spacing between the corn will be twenty inches.

Amended Protocol Section:

AGRICULTURAL PRACTICES: (last sentence), Spacing between the corn will be thirty inches.

Rationale:

It is standard practice in this region to plant corn thirty inches apart. Also all the planters available planted corn thirty inches apart.

Amendment Reviewed and Accepted:

Client Principal Investigator: *W. J. McCall* Date: 5/15/84

WIL Study Director: *Mark Johnson* Date: 7/30/84

WIL Management: *Mark Johnson* Date: 7/30/84

PROTOCOL AMENDMENT

WIL Project No.: 190-135 Client: American Cyanamid

Protocol No.: 050284/P6 (981-84-124) Amendment No.: 4

Study Title: An Evaluation of the Effects of COUNTER 15G to Terrestrial
Species Under Actual Field Use Conditions

Test Material: Counter 15G

Effective Date of Amendment: 7/26/84

Original Protocol Section:

PRE-APPLICATION MONITORING:

Amended Protocol Section:

Change section title to: SEARCHER EFFICIENCY AND PREDATOR REMOVAL:

And add as a last sentence: Collection efficiency and predator removal also will be measured approximately two to three weeks following the last application.

Rationale:

It was felt that it was necessary to check searcher efficiency and predator removal again because of changes in vegetation.

Amendment Reviewed and Accepted:

Client Principal Investigator: [Signature] Date: 5/15/84

WIL Study Director: [Signature] Date: 7/30/84

WIL Management: [Signature] Date: 7/30/84

PROTOCOL DEVIATION NOTICE

WIL Project No.: 130-135 Study/Group No: 26 Client: American Cyanamid

Protocol No.: 050284/P6 (981-84-124)

Study Title: An Evaluation of the Effects of Counter 15G to Terrestrial
Species Under Actual Field Use Conditions

Test Material: Counter 15G

Description of Deviation from Protocol:

Gross necropsies were not done on the birds found dead during the study.

Reason for Deviation from Protocol:

The Study Director felt that conducting gross necropsies could interfere
with the results of the whole body tissue analysis.

Scientist/Technician Mark John Date 7/30/84

Date of proposed or de facto X deviation 6/1/84

Protocol Deviation reviewed by:

Client Principal Investigator: [Signature] Date: 8/15/84

WIL Study Director: Mark John Date: 7/30/84

WIL Management: Mark John Date: 7/30/84

PROTOCOL DEVIATION NOTICE

WIL Project No.: 130-135 Study/Group No: 26 Client: American Cyanamid

Protocol No.: 050284/P6 (981-84-124)

Study Title: An Evaluation of the Effects of Counter 15G to Terrestrial Species Under Actual Field Use Conditions

Test Material: Counter 15G

Description of Deviation from Protocol:

The schedule given on pages 4 and 5 of the Protocol was not followed. A number of the pre-treatment surveys were not made. Post-treatment carcass searches were made according to schedule. Post-treatment bird surveys were made according to schedule, weather permitting.

Reason for Deviation from Protocol:

An attempt was made to follow the schedule; however, due to weather, application schedules and planting schedules deviations were made for some intervals.

This was not a further 104 birds get the CUP's for aerial!

Scientist/Technician Frank John Date 7/30/84

Date of proposed or de facto X deviation 5/14/84

Protocol Deviation reviewed by:

Client Principal Investigator: [Signature] Date: 8/15/84

WIL Study Director: Frank John Date: 7/30/84

WIL Management: Frank John Date: 7/20/84

ACTIVITY SCHEDULE

JULY 1984

| SUN. | MONDAY | TUESDAY | WEDNESDAY | THURSDAY | FRIDAY | SAT. |
|-----------------------------|--|--|--|--|--|--|
| 1 | 2 Start but start start by 10:00 Dynamics 1 review 5th | 3 10 AM Proctor Brent Hills Pro Store | 4 INDEPENDENCE DAY - HOLIDAY | 5 | 6 | 7 |
| 8 | 9 184 183 184 185 186 187 188 189 190 191 192 193 194 195 196 | 10 185 186 187 188 189 190 191 192 193 194 195 196 | 11 185 186 187 188 189 190 191 192 193 194 195 196 | 12 185 186 187 188 189 190 191 192 193 194 195 196 | 13 185 186 187 188 189 190 191 192 193 194 195 196 | 14 185 186 187 188 189 190 191 192 193 194 195 196 |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 29 | 30 | 31 | NOTES: | | | |
| 204 | 205 | 206 | 207 | 208 | 209 | 210 |
| AUGUST 1984 | | | AUGUST 1984 | | | |
| SUN MON TUE WED THU FRI SAT | | | SUN MON TUE WED THU FRI SAT | | | |
| 3 4 5 6 7 8 9 | | | 1 2 3 4 | | | |
| 10 11 12 13 14 15 16 | | | 5 6 7 8 9 10 11 | | | |
| 17 18 19 20 21 22 23 | | | 12 13 14 15 16 17 18 | | | |
| 24 25 26 27 28 29 30 | | | 19 20 21 22 23 24 25 | | | |
| 26 27 28 29 30 31 | | | 26 27 28 29 30 31 | | | |

JULY 1984

7540-01-068-3390
For 1985 Order 7540-01-142-9839

OPTIONAL FORM 67
(FORMERLY AD-300)5067-113