

US EPA ARCHIVE DOCUMENT

ROUTING AND TRANSMITTAL SLIP

Date 6/22/66

| TO: (Name, office symbol, room number, building, Agency/Post) |                 | Initials | Date |
|---|-----------------|----------|------|
| 1.  | Doug Wilson     |          |      |
| 2.  | John B. Caserio |          |      |
| 3.  |                 |          |      |
| 4.  |                 |          |      |
| 5.  |                 |          |      |

| Action       | File                 | Note and Return  |
|--------------|----------------------|------------------|
| Approval     | For Clearance        | Per Conversation |
| As Requested | For Correction       | Prepare Reply    |
| Circulate    | For Your information | See Me           |
| Comment      | Investigate          | Signature        |
| Coordination | Justify              |                  |

REMARKS

See his comments! we need to act fast because of my delay in getting to this review.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

|  |                |
|--|----------------|
| FROM: (Name, org. symbol, Agency/Post)<br><br>M. Glendon | Room No.—Bldg. |
|  | Phone No.      |

5041-102

U.S.G.P.O.: 1985-461-274/426

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

Doug Swan  
John Casciello

I am going to disagree with your  
final conclusion - Protocol rejected!

but basically agree with most of your  
concerns, comments & criticisms. This is  
by far, the most extensive field study I've seen  
thus far & I think it has some  
interesting elements - albeit untested & untested.  
I think I would say that the protocol  
is necessary & acceptable but we - EFB - would  
like clarification & understanding on a  
number of points. I definitely see the  
basis of Revdall in this design & I think  
there are some good ideas. As to whether  
it really "negates the presumption of hazard"  
already established, I'm not sure.

At any rate I'd like to meet with the  
Company. Perhaps we - EFB - need to meet  
together to discuss some of the issues  
raised here in this review. The  
field studies review was rather "tense"  
to say the least. This extensive protocol  
requires a lot of work on the part of the  
reviewer - which is obvious to me - and the  
field studies committee.

Because it's been in my "intermediate  
box" so long, we've probably lost anything for →

this use season. I want John B.  
to review the review & indicate protocol  
is accepted, providing the Co. ~~provides~~  
comes in & discusses many of our  
questions.

I want someone - Doug or John - to  
call the America Cyanamid contact &  
let him know what we're thinking.  
Do you both have any problems  
with my suggestions? Perhaps we  
should meet to discuss further.

M. Slavin  
9/22/56

I believe that we have Mark  
Kane FD, not directly with the  
company until the actual  
meeting. We've had a poor record  
etc. clear telephone communication  
directly to the company. J.S.C.

Observations of ... to get out more

The carcass search proposals seems promising but must be specifically described in terms of the actual sites, once selected. ~~The more intensive program may be required if~~ <sup>availability is apparent</sup>

I recommend not emphasizing the insect work as proposed, as this information will be very difficult to interpret. While we agree that insect populations may be an important factor in bird presence, we are not interested in the particular insect population variations at the study sites per se, but rather in the specific effect of the pesticide on the birds. The insect population variation between sites is likely to be considerable. Keep in mind that the population parameters previously discussed are more important than the insect densities.

~~proceed with the study~~  
The protocol will need to fully discuss residue monitoring. Sampling design, schedules and analytical methodology in soils, vegetation and wildlife must be discussed.

An outline for writing protocols is enclosed for use by the registrant. We strongly recommend meeting on the issue after a protocol is proposed.

10. Conclusion: Protocol accepted \_\_\_\_\_

Protocol accepted with modifications \_\_\_\_\_

Protocol rejected \_\_\_\_\_ **X**

*John Bascietto*  
John Bascietto  
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Hazard Evaluation Division  
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*Douglas Urban 6/30/86*  
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