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NOTIFICATION TO RD ZE: STATUS
OF TERBUFOS PROTOCOL AS DISCUSSED /

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

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JAN 26 1988

<u>MEMORANDUM</u>

OFFICE OF PESTICIDES ANO TOXIC SUBSTANCES

SUBJECT: Status of protocol review for American Cyanamid

terrestrial field study (Level II) of terbufos.

Record No. 203351

FROM: David Warburton, Wildlife Biologist

Ecological Effects Branch

Hazard Evaluation Division (TS-769C)

1 1

THRU: Douglas J. Urban, Section Head 3

Ecological Effects Branch

Hazard Evaluation Division (TS-769C)

THRU: Harry T. Craven, Acting Chief

Ecological Effects Branch

Hazard Evaluation Division (TS-769C)

TO: William H. Miller, PM 16

Insecticide-Rodenticide Branch Registration Division (TS-767C)

This is to notify you that Ecological Effects Branch (EEB) is currently reviewing the Level II terrestrial field study protocol (Protocol No.: 981-86-101.1) for terbufos submitted by American Cyanamid Company (Record No.: 203351). Preliminary review of the protocol indicates problems and inconsistencies of significant nature. Of greatest concern is the proposed use of starling nest boxes to measure avian productivity. Due to feeding habits which minimize potential exposure to terbufos granules, the starling is unacceptable as a test species for this study. Although a detailed response to this and other issues in the protocol is forthcoming (in approximately 1 month), EEB believes that American Cyanamid should be made aware as to the status of the proposed protocol review as soon as possible as it may affect 1988 study plans. The protocol schedule outlines full-scale field studies to be initiated with the 1988 spring planting season. While EEB indeed prefers to support this schedule, we recognize that revision of the proposed study following EEB review may affect the 1988 starting date. We therefore recommend that American Cyanamid be notified of our preliminary findings and our review schedule so they will be prepared to accommodate these changes.