



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

3-2-89

2 MAR 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: REGISTRATION OF A NEW GRANULAR TERBUFOS FORMULATION (20G)
- EVALUATION OF WORKER EXPOSURE (HED PROJECT NO. 9-0862)

TO: William Miller, Product Manager 16
Registration Division (H7505C)

FROM: Michael P. Firestone, Ph.D., Chief
Review Section 1
Non-Dietary Exposure Branch/HED (H7509C)

THRU: Charles L. Trichilo, Ph.D., Chief
Non-Dietary Exposure Branch/HED (H7509C)

Please find below the NDEB review of

Record No.:	239 863	Caswell No.	131 A
Date Received:	2/13/89	Review Time:	2 days
Deferral to:	TB-IRS/HED	<u> X </u>	
	TB-HFAS	<u> </u>	
	SACB/HED	<u> X </u>	
	BAB/BEAD	<u> </u>	

The purpose of the subject submission is to seek registration of a new granular turbufos formulation (20G) - trade name Counter@ XL - for use on field corn, sugar beets and grain sorghum.

According to the Data Review Record (DRR), Special Review Branch (SRB)/SRRD called a meeting on February 10, 1989 (attendees not specified) in which "it was determined that additional data are required to enable the Agency to determine if user/applicator/handler's risk of exposure to this new formulation (which has a [redacted] covering the granule) would be lower than the risk of exposure to the current registered 15G terbufos." Further, the DRR asks "what, if any, additional data would NDE(B) need to make this determination." Finally, although the DRR states that an expedite memorandum will follow, none has been received.

INERT INGREDIENT INFORMATION IS NOT INCLUDED

NDEB concludes that is impossible to compare the exposure to terbufos resulting from the use of the currently registered 15G product to the newly proposed 20G formulation without an actual study conducted according to Subdivision U (Applicator Exposure Monitoring) of the Pesticide Assessment Guidelines. Should such a study be conducted, a protocol should first be submitted to NDEB.

NDEB defers to Science Analysis and Coordination Branch (SACB) Toxicology Branch - Insecticide/Rodenticide Support (TB-IRS) as to the toxicological endpoint of concern, as well as the appropriate NOEL and safety factor for such an endpoint if a handler exposure and risk assessment is necessary.

cc: Sue Rathman
SACB
TB-IRS
Terbufos File
Correspondance File
Circulation