

AWZ

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 RECIEVED 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.

105001 Counter 15G (terbufos) 15

2 pages  
w/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<sup>®</sup> 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  
2nd because of more practice throughout  
the study - look the initial efficiencies!*

*check label  
X less granules applied*

*3  
0.784*



Mr. W. Miller  
COUNTER<sup>®</sup> systemic  
insecticide-nematicide

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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 dark ink, appearing to read 'Kenneth A. Sund'.

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

KAS:sd  
Enc.

<sup>®</sup>Registered trademark of American Cyanamid Company

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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. M. 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.: 2

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:

STUDY DIRECTOR:

Joann Beavers  
Avian Physiologist

Amended Protocol Section:-

STUDY DIRECTOR:

Mark Jaber  
Wildlife Toxicologist

Rationale: The management felt that Ms. Beavers has many other responsibilities; and therefore, would not have time to take on this study.

Amendment Reviewed and Accepted:

Client Principal Investigator: Novell Date: 8/13/84

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

WIL Management: Mark Jaber 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.: 198-135 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: 8/15/84

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.

Scientist/Technician Mark John Date 7/30/84

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

Protocol Deviation reviewed by:

Client Principal Investigator: Mark John Date: 8/15/84

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

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

*This was not  
a further  
delay but  
get the  
CNP's  
for analysis!*

# ACTIVITY SCHEDULE

JULY 1984

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
1	2 Start but SAT Drama review 5th	3 10 AM MentHlas for store	4 INDEPENDENCE DAY— HOLIDAY	5	6	7
8	9 8:30 AM Review and	10 5:15 AM MentHlas MentHlas	11 10 AM MentHlas MentHlas	12 10 AM MentHlas MentHlas	13 10 AM MentHlas MentHlas	14 10 AM MentHlas MentHlas
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				
204	205	206	207	208	209	210
211	212	213	214	215	216	217

JULY 1984

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

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