

239863  
Record No.

Review No.

105001  
Shaughnessey No.

EEB REVIEW

DATE: IN February 13, 1989 OUT February 21, 1989

FILE OR REG. NO. 241-GRU

PETITION OR EXP. NO. \_\_\_\_\_

DATE OF SUBMISSION (Previous submission) June 10, 1989

DATE RECEIVED BY EFED February 13, 1989

RD REQUESTED COMPLETION DATA February 24, 1989

EEB ESTIMATED COMPLETION DATE February 24, 1989

RD ACTION CODE/TYPE OF REVIEW \_\_\_\_\_

TYPE PRODUCTS(S): I, D, H, F, N, R, S Insecticide/Nematicide

DATA MRID NO(S). \_\_\_\_\_

PRODUCT MANAGER NO. William Miller PM#16

PRODUCT NAME(S) Counter XL, Terbufos 20P

COMPANY NAME American Cyanimid Company

SUBMISSION PURPOSE RD request for clarification of avian data  
required to support proposed registration (concerns previous EEB  
review of December 15, 1988)

SHAUGHNESSEY NO.	CHEMICAL AND FORMULATION	% A.I.
<u>105001</u>	<u>Terbufos 20P, Counter XL</u>	<u>20%</u>
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 21, 1989

MEMORANDUM

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

Subject: Data needed for the registration of Terbufos XL (20P).

From: for James W. Akerman, Chief *Raymond W. Matheny*  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

To: William Miller  
Product Management Team #16  
Insecticide and Rodenticide Branch  
Registration Division (H7505C)

Because Counter 15G has exceeded the level of concern for endangered species and nontarget wildlife, it had to undergo a screening field test with a wide range of cultivation and geographic variables in conjunction with more rigorous wildlife risk evaluation techniques (see Fite, et al., 1988, Guidance Document for Conducting Terrestrial Field Studies, E.P.A., Washington, DC). It was found that it killed birds and now must go through a definitive field test in order to refute or, at least, quantify its hazards.

Due to its analysis of the LD<sub>50s</sub>, LC<sub>50s</sub>, and the particle sizes of Counter 15G and Counter XL, EEB concluded that Counter XL could pose a hazard as great as Counter 15G. Therefore it must go through field tests similar to those for Counter 15G. The screening test is not necessary if the registrant wishes to go directly to the definitive field test.

EEB invites field test protocols for review, but the studies must be completed in the time allowed.