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1. CHARLIE LEWIS (FOR DOW URBAN)			CKL 1/26/88
2. HARRY CRAVEN			HJC 1/26/88
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Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
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Coordination	Justify		

REMARKS

NOTIFICATION TO RD RE: STATUS
OF TERBUFOS PROTOCOL AS DISCUSSED
1/22/88.

TO BE SENT TO RD ASAP.

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

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
DAVE WARBURTON	
	Phone No.

5041-102

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

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JAN 26 1988

MEMORANDUM

OFFICE OF
PESTICIDES AND 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)

Dail Walton
1/26/88

THRU: Douglas J. Urban, Section Head 3
Ecological Effects Branch
Hazard Evaluation Division (TS-769C)

Charles Turner for
1/26/88

THRU: Harry T. Craven, Acting Chief
Ecological Effects Branch
Hazard Evaluation Division (TS-769C)

Harry T. Craven
1/26/88

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.