

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Thiabendazole on Soybeans)

DATE: 4/18/77

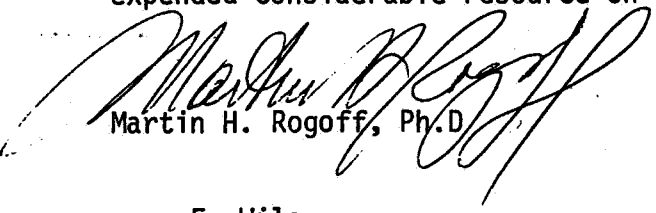
FROM: M. Rogoff

TO: R. Ney

I do not concur in your memorandum 4/18/77 to Mr. Campt, same subject. Mr. Campt requested that you assess incremental risk. Your memo states you cannot do this without certain data. However, your memo also indicates that you know something about uptake by fish and rotational crops. The number of extant tolerances would also indicate some knowledge of residue chemistry for this chemical moiety.

Incremental risk assessment should be approached by determining what percent soybean acreage and treatments would represent as opposed to combined allowed use on apples, pears, citrus, sugar beets, potatoes, and squash plus any non tolerance uses. This will give you a starting point for the increment. Second, the data in hand should be used to determine probable residue level. This should be compared to probable residue level from other treatments. A determination should then be made as to whether this use would impact significantly in terms of probable residue on what will probably already be and continue to be put out from registered uses. Obviously this is the expected type of response as I read Mr. Campt's memorandum.

Please address Mr. Campt's request directly. We have already expended considerable resource on this.

  
Martin H. Rogoff, Ph.D.

cc: E. Wilson  
D. Campt  
H. Harrison  
J. Mayes  
J. Touhey