

*Chemistry Branch*

June 18, 1971

*File: pp# OF0906*

Mr. Taylor W. Hanavan  
Legal Department  
E. I. Du Pont De Nemours & Company  
Wilmington, Delaware 19898

*[Handwritten signatures: Cummings, Baker, Duffey, Borden]*

Dear Mr. Hanavan:

This refers to the fungicide benomyl and the conference we had with Mr. Rosen, Dr. Stula and Dr. Lee April 27, 1971.

As we advised in that conference, new petitions for benomyl in addition to pending petitions OF0906, OF1000, IF1033 and IF1045, will require a detailed histopathology examination and report including fat stains on liver and iron stains on bone marrow from the dogs fed for two years at 500 parts per million and 100 parts per million. Toxicity data so far submitted on benomyl support a "no-effect level" for benomyl which may be sufficient to assure safety of the tolerances requested in the listed pending petitions. We noted in the conference, however, the desirability of further histopathologic studies in order to show whether the "no-effect level" may actually be greater than our minimal estimate. For assurance of safety of further tolerances on benomyl, our toxicologists and pathologists find that we need these additional studies.

The pending petition IF1145 which proposes a tolerance of 3 p.p.m. for residues of benomyl on celery is affected by this requirement. Future petitions will also be affected by this requirement.

In response to a request from Mr. D. E. Rosen we are enclosing a copy of tolerances for meat, milk, poultry and eggs established during the period January 1, 1970 to May 17, 1971.

Sincerely yours,

Drew M. Baker, Jr., Chief  
Petitions Control Branch

Enclosure

cc: PRD, EPA

PTD, Chemistry Branch, Toxicology Branch, OGFitzhugh  
PP Nos. OF1000, IF1010, IF1033, IF1045, IF1145 and OF0906

DMBaker:ea 6/18/71-6/7/71:ggr 5/26/71  
R/D Init:OGFitzhugh, FJMcFarland 6/8/71

*Does this put IF1145  
in request status?  
Yes (Baker, Olay)  
GD  
7/14/71*

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