UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: Thiabendazole on Soybeans

DATE: March 30, 1977

FROM: Acting Director
Registration Division (WH-567)

TO: Branch Chief
Efficacy, and Ecological Effects Branch

There is a petition pending (5F1646) for Thiabendazole on soybeans submitted by Merck and Company. In a letter dated December 14, 1976, Merck and Company was informed of three major deficiencies. One of the comments concerned data on rotational crops which Merck has since satisfied. Another requirement was an 18 month mouse study which Dr. Rogoff subsequently reviewed and wrote a recommendation that Merck should be allowed 36 months to develop and submit the data. The remaining major problem concerns environmental chemistry data. Mr. Ney's review indicated that the following data is necessary to establish a tolerance. (1) aged leaching study, (2) field soil study, (3) photodecomposition in soil, (4) effects of microbes on pesticides, sterile vs. non-sterile.

Please consider the proposed tolerance for Thiabendazole in light of an assessment of any incremental environmental risks presented by this use over and above presently registered uses. Advise if such consideration would obviate the need for the above listed environmental chemistry studies.

Please give this matter immediate attention.

Douglas D. Campt

cc: Mr. Harrison

EPA Form 1320-6 (Rev. 6-72)