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

MAY 3 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Anticipated Residues of MBC on food and feed commodities resulting from registered use of benomyl and thiophanate methyl. (RD Record No. 240751, HED Project No. 9-0954, DEB No. 4991)

FROM: Debra F. Edwards, Ph.D., Acting Section Chief
Tolerance Petition Section II
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THROUGH: Richard D. Schmitt, Ph.D., Acting Chief
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TO: Hoyt Jamerson
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Registration Support Branch
Registration Division (H7505C)

A TAS analysis, conducted in November 1988 (S. Stanton) for thiophanate methyl in conjunction with a proposed use on potatoes (PP# 7E3555), included an estimate of oncogenic risk for the MBC metabolite (methyl 2-benzimidazole carbamate). This analysis, in which tolerances (adjusted for the molecular weight difference between thiophanate methyl and MBC) and percent crop treated data were used, indicated an oncogenic risk of 2.8×10^{-5}. Therefore, RD has requested that DEB provide actual residue levels for the metabolite, MBC, on food or feed commodities resulting from existing use of thiophanate methyl to permit a "more realistic risk assessment."

After consulting with SRRD (P. Hundemann and V. Prunier) and SACB/HED (A. Kocialski), DEB has developed the following initial approach to determine anticipated residues of MBC in foods and feeds.

1. Since MBC is also a known metabolite of benomyl, anticipated residues of MBC in food resulting from the use of benomyl as well as thiophanate methyl will be determined.

2. Due to the known concern for oncogenic risk and the nature of the work involved in this project, Special Registration Section II (Acting Section Chief = Bart Suhre) will complete the dietary exposure estimates, in conjunction with the TAS Staff (R. Tomerlin).

3. Because both thiophanate methyl and benomyl are chemicals now in the reregistration process, DEB will coordinate future work on this project with SRRD (P. Hundemann).

H7509C:D.Edwards:5/3/89:DEB/HED:CM#2:RM810:557-1878

cc: PMSD/ISB, Reg. Standard Files: Benomyl and Thiophanate Methyl, RF, B.Suhre (DEB), P. Hundemann (RB/SRRD), A.Kocialski (SACB/HED), Circu

RDI:R.Loranger,5/89