



ConAgra Foods Foodservice Company
Specialty Potato Products
Administrative Office
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August 12, 2004

Public Information and Records
Integrity Branch
Office of Pesticide Programs
U.S. Environmental Protection Agency
Crystal Mall 2
1801-Bell Street
Arlington, VA 22202

TEL: 509-735-4651
FAX: 509-736-0399

Re: **Importance of metam sodium to potato production, comments on Risk Assessment**
Docket ID Number OPP-2004-0159

Dear Sir/Madam:

ConAgra Foods Foodservice Company submits these comments on the U.S. Environmental Protection Agency's (EPA) "Metam Sodium Availability of Risk Assessments" (Risk Assessment), the availability of which was announced in the *Federal Register* on June 2, 2004.

We have used metam-sodium for many years for potato production because metam-sodium is an effective, cost-efficient, and reliable soil fumigant. Metam sodium is critical for the control of early die disease in potatoes and the suppression of weeds and nematodes. We cannot overstate the importance of metam-sodium to our ability to grow a healthy crop of potatoes. This state grows some of the best potatoes in the country, supplying much of the country's demand for potatoes. We urge EPA in the strongest possible terms to ensure that our continued use of metam-sodium continues unchanged.

ConAgra Foods Foodservice Company supports the comments on the Risk Assessment submitted to EPA by the Metam-Sodium Alliance, which consists of the U.S. registrants of metam-sodium and metam-potassium. For detailed suggestions for the Risk Assessment, please refer to their comments.

ConAgra Foods Foodservice Company understands that EPA is required to issue the revised Risk Assessment by August 31, 2004. EPA should clearly state that its review of metam-sodium is preliminary and that no conclusions can be drawn or inferred from the Risk Assessment in its current preliminary state.

We understand that EPA sometimes uses models in its assessment of pesticide risk. We hope that EPA will use actual field data to the fullest possible extent in its review of metam sodium. **If the EPA needs any help understanding the reality of metam sodium use, please feel free to contact me.**

ConAgra Foods Foodservice Company appreciates this opportunity to comment on the Risk Assessment. Please let us know if you have any questions.

Sincerely,

David Smith
Director of North America Ag Services