EFFICACY EVALUATION AND TECHNICAL MANAGEMENT SECTION
EFFICACY REVIEW - I

Antimicrobial Program Branch

IN 11-20-89   OUT 03-28-90

Reviewed By _Emily H. Mitchell_____ Date 03-28-90

EPA Reg. No. or File Symbol _____10466-28_____

EPA Petition or EUP No. _____None_____

Date Division Received _____02-02-90_____

Type Product(s)___Bacteriostatic/Fungistatic Industrial Preservative

Data Accession No.(s)_____413294-01_____

Product Mgr. No._____PM 31 (Lee)_____

Product Name(s)_____Ultra-Fresh ® DM-50_____

Company Name(s)_____Thomson Research Associates, Ltd.

Submission Purpose_Additional labeling claims for the decontamination

_____of ductwork surfaces_____

Chemical & Formulation _Liquid Concentrate for Commercial Application

Active Ingredient(s):   %

Tributyltin maleate . . . . 25.0 %

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Product Manager No. _____ PM 31 (Lee)

Product Name _____ Ultra-Fresh ® DM-50

Company Name _____ Thomson Research Associates

202.0   Recommendations

At this time, the registration division is not accepting
label recommendations for the treatment of air ducts with
antimicrobial agents. We are currently evaluating this
use in an effort to prescribe appropriate use precautions
to prevent unreasonable adverse effects to man and/or
the environment. The following comments are provided for
your information.

It is assumed the product would be fogged since there is
no other way to wet the surfaces manually. In all fogging
applications we usually require that the treatment areas
are vented during application and adequately ventilated
prior to re-entry.

Acute inhalation data will be required. In addition,
unless it can be demonstrated that levels of the active
ingredient in the air are less than the level of detec-
tion or are present at a level of no concern, subchronic
inhalation data will be required. We also would be
concerned with the breakdown products resulting from
heat when the system is returned to use.