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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

**SUBJECT:** Justification for Requesting Post-Application  
Inhalation Exposure Monitoring Studies for List B  
Chemicals As Mercury Alternatives In Paint

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The purpose of this memorandum is to justify the option for post-application inhalation exposure data for the List B Chemicals, Oothilinone, Bis (trichloromethyl) Sulfone, Potassium Dimethyl dithiocarbamate, o-Phenylphenol Sodium Salt, Dibromodicyanobutane and Thiocyanomethylthio-benzothiazole which are alternative chemicals for the mercury containing paints, in order to fulfill the data requirements in support of FIFRA' 88 reregistration requirement.

Section II of the DATA CALL-IN NOTICE FOR SUBCHRONIC AND CHRONIC TOXICOLOGICAL DATA FOR ANTIMICROBIAL PESTICIDE ACTIVE INGREDIENT indicated that EPA is concerned about the economic effects that imposition of full toxicology data requirements for antimicrobials would have on the industry and user community. EPA has concluded that for these pesticides it should be possible to evaluate risk by acquiring exposure data and by acquiring toxicity data under a tiered approach, in which low-tier (and less expensive) toxicity data (alone, or in combination with the exposure data) indicate the need for the higher-tier tests.

It has come to our attention that there are chronic toxicological concerns regarding the potential post-application exposure of individuals after the use of paints containing preservatives. Based on this and an evaluation of the use of the above compounds in paint, it has been determined that these pesticides fulfill the criteria for requesting exposure data as stated in Section 234 of Subdivision U ( Pesticide Assessment Guidelines ) - Estimation of Post-Application Inhalation Exposure at Indoor Sites. We therefore recommend the following data be offered as a viable option in place of conducting long-term chronic toxicology studies in support of reregistration of these products.

The methodology for monitoring the post-application inhalation exposure at indoor sites should be followed by the same techniques employed in Section 232 of Pesticides Assessment Guidelines-Subdivision U.

The estimated cost for performing an air monitoring study to monitor inhalation exposure is \$50,000. In addition, the registrant should submit a protocol to the Agency for review, prior to performing the study, if they choose this option.

The registrant may submit additional product use information/data which might obviate generating an actual post-application air monitoring study in support of reregistration requirements.

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