

US EPA ARCHIVE DOCUMENT

U.S. Environmental Protection Agency
Phase 3 Data Dump

6/3/91
Pg. 1

Company Number / Name	ROHM & HAAS COMPANY	
000707 / Address	PHILADELPHIA, PA	
Chemical Number / Name	099901 Octhilinone	
Case Number / EPA Manager	2475 Frank Rubis	Use Pattern FM

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	61-1	Chemical Identity	Y R 1		
	61-1	Chemical Identity	148769	No Decision Yet	
B	61-2(a)	Begin. mat. & mnfg.	Y R 1		
	61-2(a)	Begin. mat. & mnfg.	148769	No Decision Yet	
B	61-2(b)	Discussion of Impuri	Y R 1		
	61-2(b)	Discussion of Impuri	148769	No Decision Yet	
B	62-1	Preliminary Analysis	Y CR 1 6 7		
	62-1	Preliminary Analysis	41496301	Not Yet Reviewed	
	62-1	Preliminary Analysis Misc			
B	62-2	Certification of lim	Y R 1 6 7		
	62-2	Certification of lim	41496301	Not Yet Reviewed	
	62-2	Certification of lim Misc			
B	62-3	Analytical Method	Y R 1 6 7		
	62-3	Analytical Method	41496301	Not Yet Reviewed	
	62-3	Analytical Method Misc			
B	63-2	Color	Y R 1 10		
	63-2	Color	148769	No Decision Yet	
	63-2	Color	41684801	Not Yet Reviewed	
B	63-3	Physical State	Y R 1 10		
	63-3	Physical State	148769	No Decision Yet	
	63-3	Physical State	41587801	Not Yet Reviewed	
B	63-4	Odor	Y R 1 10		

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	63-4	Odor	148769	No Decision Yet	
	63-4	Odor	41684801	Not Yet Reviewed	
B	63-5	Melting Point	R 1 7		
	63-5	Melting Point	148769	No Decision Yet	
	63-5	Melting Point	41684801	No Decision Yet	
	63-5	Melting Point	Misc		
B	63-6	Boiling Point	Y R 1 10		
	63-6	Boiling Point	148769	No Decision Yet	
	63-6	Boiling Point	41687801	Not Yet Reviewed	
B	63-7	Density	Y R 1 10		
	63-7	Density	148769	No Decision Yet	
	63-7	Density	41687801	Not Yet Reviewed	
B	63-8	Solubility	Y R 1 10		
	63-8	Solubility	148769	No Decision Yet	
	63-8	Solubility	41687801	Not Yet Reviewed	
B	63-9	Vapor Pressure	Y R 1 7		
	63-9	Vapor Pressure	148769	No Decision Yet	
	63-9	Vapor Pressure	41482501	Not Yet Reviewed	
	63-9	Vapor Pressure	41687801	Not Yet Reviewed	
	63-9	Vapor Pressure	Misc		
B	63-10	Dissociation Constan	R 7		
	63-10	Dissociation Constan	N/A	Denied	

U.S. Environmental Protection Agency
Response to Phase 2 Submission

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
B	63-11	Oct/Water partition	Y CR 1 10
	63-11	Oct/Water partition	148769
	63-11	Oct/Water partition	41687801
			No Decision Yet
			Not Yet Reviewed
B	63-12	pH	CR 7
	63-12	pH	N/A
B	63-13	Stability	Y R 1 10
	63-13	Stability	148769
	63-13	Stability	41687801
			No Decision Yet
			Not Yet Reviewed
B	63-14	Oxidizing/Reducing A	CR
B	63-15	Flammability	CR 1 7
	63-15	Flammability	148769
	63-15	Flammability	Misc
			No Decision Yet
B	63-16	Explodability	R 1
	63-16	Explodability	148769
			No Decision Yet
B	63-17	Storage stability	Y R 1 7
	63-17	Storage stability	148769
	63-17	Storage stability	Misc
			No Decision Yet
B	63-18	Viscosity	Y CR 1 7
	63-18	Viscosity	148769
	63-18	Viscosity	Misc
			No Decision Yet

Comments: Dissociation constant can and must be measured since the product is soluble in water at 462 ppm.

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	63-19	Miscibility	CR		
B	63-20	Corrosion characteri	Y R 1 7		
	63-20	Corrosion characteri	148769	No Decision Yet	
	63-20	Corrosion characteri	Misc		
B	63-21	Dielectric breakdown	CR		
B	71-1(a)	Acute avian oral qua	Y R 1 4		
	71-1(a)	Acute avian oral qua	26809	No Decision Yet	
	71-1(a)	Acute avian oral qua	41608001	Fully Accept	
<p>Comments: This study is acceptable and fulfills the guideline requirement 71-1. The LD50 of octhailinone is 660 mg a.i./kg, therefore it is considered slightly toxic. The NOEL was not determined. A copy of the DER is attached.</p>					
B	71-1(b)	Acute avian oral qua			
B	71-2(a)	Acute avian diet. qu	Y R 1 4		
	71-2(a)	Acute avian diet. qu	26808	No Decision Yet	
	71-2(a)	Acute avian diet. qu	41608002	Fully Accept	
<p>Comments: This study is acceptable and fulfills the guideline requirement 71-2(a). The LC50 of octhailinone is >3267 ppm, therefore it is considered slightly toxic. The NOEL is 1288 ppm. A copy of the DER is attached.</p>					
	71-2(a)	Acute avian diet. qu	41608003	No Decision Yet	
B	71-2(b)	Acute avian diet. du	1		
	71-2(b)	Acute avian diet. du	41608003	Fully Accept	

U.S. Environmental Protection Agency
Response to Phase 2 Submission

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
--------	-------------	------------------------------	--------------

Comments: This study is acceptable and fulfills the guideline requirement 71-2(b). The LC50 of othilinone to mallards is 1215 ppm, therefore it is considered slightly toxic. The NOEL was not determined. A copy of the DER is attached.

B	71-3	Wild mammal toxicity	
B	71-4(a)	Avian repro. quail	
B	71-4(b)	Avian repro. duck	
B	71-5(a)	Simulated field stud	
B	71-5(b)	Actual field study	
B	72-1(a)	Fish toxicity bluegi Y R 1 4	
	72-1(a)	Fish toxicity bluegi 136217	No Decision Yet
	72-1(a)	Fish toxicity bluegi 41608004	Fully Accept

Comments: This study is acceptable and fulfills the guideline requirement for 72-1(a). The LC50 of othilinone to bluegill sunfish is 0.18 ppm, therefore it is considered highly toxic. The NOEL is 0.069 ppm.

B	72-1(b)	Fish toxicity bluegi CR	
B	72-1(c)	Fish toxicity rainbo R 1 4	
	72-1(c)	Fish toxicity rainbo 136217	Fully Accept
	72-1(c)	Fish toxicity rainbo 41608005	Fully Accept

Comments: This study is acceptable and fulfills the guideline requirement 72-1(c). The LC50 of othilinone to rainbow trout is 0.047 ppm, therefore it is considered very highly toxic. The NOEL is 0.023 ppm. A copy of the DER is attached.

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	72-1(d)	Fish toxicity rainbo	CR		
B	72-2(a)	Invertebrate toxicit	R 1 4		
	72-2(a)	Invertebrate toxicit	41608006	Fully Accept	
<p>Comments: This study is acceptable and fulfills the guideline requirement 72-2(a). The EC50 of othilinone to Daphnia magna is 0.32 ppm, therefore it is considered highly toxic. The NOEL is 0.21 ppm. A copy of the DER is attached.</p>					
B	72-2(b)	Invertebrate toxicit	CR		
B	72-3(a)	Estu/mari tox. fish	CR 1 4		
	72-3(a)	Estu/mari tox. fish	41608007	Fully Accept	
<p>Comments: This study is acceptable and fulfills the guideline requirement 72-3(a). The LC50 of othilinone to sheepshead minnow is .16 ppm, therefore it is considered highly toxic. The NOEL is 0.054 ppm. A copy of the DER is attached.</p>					
B	72-3(b)	Estu/mari tox. mollu	CR 1 4		
	72-3(b)	Estu/mari tox. mollu	41700701	Fully Accept	
<p>Comments: This study is acceptable and fulfills the guideline requirement 72-3(b). The LC50 was not determined as no mortalities occurred at the concentrations tested. The EC50 for shell deposition is 0.013 ppm, and the 95% C.I. is 0.0064 - 0.025 ppm. The NOEL is <0.003ppm, the lowest concentration tested. Othilinone is considered to be very highly toxic to mollusks. A copy of the DER is attached.</p>					
B	72-3(c)	Estu/mari tox. shrim	CR 1 4		
	72-3(c)	Estu/mari tox. shrim	41608008	Fully Accept	

6

U.S. Environmental Protection Agency
Response to Phase 2 Submission

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
--------	-------------	------------------------------	--------------

Comments: This study is acceptable and fulfills the guideline requirement 72-3(c). The LC50 of othilinone to mysid shrimp is 0.071 ppm, therefore it is considered very highly toxic. The NOEL is <0.034 ppm. A copy of the DER is attached.

B	72-3(d) Estu/mari tox. fish	CR	
B	72-3(e) Estu/mari tox. mollu	CR	
B	72-3(f) Estu/mari tox. shrim	CR	
B	72-4(a) Early life stage fis	CR 4	08/24/90

Comments: You committed to generate this guideline requirement in Phase 2. The due date was August 24, 1990 and it is now overdue. The Agency is referring this information to the Office of Compliance Monitoring for appropriate action.

B	72-4(b) Life cycle invertebr	CR 4	08/24/90
---	------------------------------	------	----------

Comments: See comment for 72-4(a).

B	72-5 Life cycle fish	CR	
B	72-6 Aquatic org. accumul	CR	
B	72-7(a) Simul. field-aquatic	CR	
B	72-7(b) Actual field-aquatic	CR	
D	81-1 Acute oral tox. rat	R 1 7	
	81-1 Acute oral tox. rat	46402	No Decision Yet
	81-1 Acute oral tox. rat	41482502	Deficient

Comments: This study was conducted using a 46.7% formulation. This concentration can not be substituted for the

U.S. Environmental Protection Agency
Response to Phase 2 Submission

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
--------	-------------	------------------------------	--------------

MRID Comments Continued:
 technical concentration. This remains a data gap.

	81-1	Acute oral tox. rat	Waiver	Denied
B	81-2	Acute dermal tox. ra	R 7	
	81-2	Acute dermal tox. ra	46402	No Decision Yet
	81-2	Acute dermal tox. ra	Waiver	Fully Accept

Comments: Waiver is granted based on documentation in MRID #41482504 that the 46.7% active ingredient solution is corrosive.

B	81-3	Acute inhal. tox rat	R 1 7	
	81-3	Acute inhal. tox rat	46402	No Decision Yet
	81-3	Acute inhal. tox rat	41482503	Deficient

Comments: This study is not acceptable. However, this requirement is being reserved pending review of the subchronic 90-day inhalation - rat study.

	81-3	Acute inhal. tox rat	Waiver	Denied
B	81-4	Primary eye irration	R 1 7	
	81-4	Primary eye irration	46402	No Decision Yet
	81-4	Primary eye irration	Waiver	Fully Accept

Comments: See comments for 81-2.

B	81-5	Primary dermal irrit	R 1 7	
	81-5	Primary dermal irrit	136216	No Decision Yet

8

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	81-5	Primary dermal irrit	41482504	Not Yet Reviewed	
	81-5	Primary dermal irrit Misc			
B	81-6	Dermal sensitization	R 1 7		
	81-6	Dermal sensitization	136216	No Decision Yet	
	81-6	Dermal sensitization	41282505	Deficient	
	Comments: Study does not include documentation of positive control and is therefore unacceptable.				
	81-6	Dermal sensitization	41482506	Not Yet Reviewed	
	81-6	Dermal sensitization	41482507	Deficient	
	Comments: Study does not include documentation of positive control and is therefore unacceptable.				
	81-6	Dermal sensitization Misc			
B	81-7	Acute delayed neurot	CR		
B	82-1(a)	90-day feeding-roden	CR		
B	82-1(b)	90-day feeding-nonro	CR		
B	82-2	21-day dermal-rabbit	CR		
B	82-3	90-day dermal-rodent	CR 4		08/24/91
B	82-4	90-day inhal.-rat	CR 1 7		
	82-4	90-day inhal.-rat	41544701	Not Yet Reviewed	
	82-4	90-day inhal.-rat	Misc		
B	82-5(a)	90-day neurotox-hen	CR		
B	82-5(b)	90-day neurotox-mamm	CR		

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	83-1(a)	Chronic tox-rodent	CR		
B	83-1(b)	Chronic tox - non-ro	CR		
B	83-2(a)	Oncogenicity - rat	CR		
B	83-2(b)	Oncogenicity-mouse	CR		
B	83-3(a)	Teratogenicity - rat	CR 1 7		
	83-3(a)	Teratogenicity - rat	46403	No Decision Yet	
	83-3(a)	Teratogenicity - rat	41482508	Not Yet Reviewed	
	83-3(a)	Teratogenicity - rat	Misc		
B	83-3(b)	Teratogenicity - rab	CR 1 7		
	83-3(b)	Teratogenicity - rab	136528	No Decision Yet	
	83-3(b)	Teratogenicity - rab	41482509	Not Yet Reviewed	
	83-3(b)	Teratogenicity - rab	Misc		
B	83-4	2-generation repro.-	CR		
B	84-2(a)	Gene mutation-ames	R 1 7		
	84-2(a)	Gene mutation-ames	40647501	No Decision Yet	
	84-2(a)	Gene mutation-ames	40647502	Not Yet Reviewed	
	84-2(a)	Gene mutation-ames	41482510	Not Yet Reviewed	
	84-2(a)	Gene mutation-ames	Misc		
B	84-2(b)	Struct. chrom. aberr	R 1		
	84-2(b)	Struct. chrom. aberr	40647503	No Decision Yet	
	84-2(b)	Struct. chrom. aberr	40647504	Not Yet Reviewed	
B	84-4	Other genotoxic effe	R 1		

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
	84-4	Other genotoxic effe	40647505	Not Yet Reviewed	
B	85-1	General metabolism	CR		
B	85-2	Dermal penetration	CR		
B	86-1	Domestic animal safe	CR		
B	122-1(a)	Seed germ/seedling e	R		
B	122-1(b)	Vegetative vigor	R		
B	122-2	Aquatic plant growth	R		
B	123-1(a)	Seed germ/seedling e	CR		
B	123-1(b)	Vegetative vigor	CR		
B	123-2	Aquatic plant growth	CR		
B	124-1	Terrestrial field	CR		
B	124-2	Aquatic field	CR		
B	132-1(a)	Foliar residue dissi			
B	132-1(b)	Soil residue dissipa			
B	133-3	Dermal passive dosim	cr		
B	133-4	Inhal. passive dosim	cr		
B	141-1	Honey bee acute cont			
B	141-2	Honey bee residue on			
B	141-5	Field test for polli	CR		
B	160-5	Chemical identity	R 1 7		
	160-5	Chemical identity	148769	No Decision Yet	
	160-5	Chemical identity	Misc		

//

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	161-1	Hydrolysis	R 1 4		08/24/90
		Comments: See comment for 72-4(a).			
	161-1	Hydrolysis	38540	No Decision Yet	
B	161-2	Photodegradation-wat	R 4		08/24/90
		Comments: See comment for 72-4(a).			
D	161-3	Photodegradation-soi		Required	
		Comments: This guideline is required based on terrestrial food and feed crop and terrestrial (cotton; seed treatment) nonfood crop (wood protection treatment) uses as listed on some labels.			
B	161-4	Photodegradation-air			
D	162-1	Aerobic soil metabol		Required	
		Comments: See comment for 161-3.			
B	162-2	Anaerobic soil metab			
B	162-3	Anaerobic aquatic me	R 4		08/24/91
B	162-4	Aerobic aquatic meta	R 4		08/24/91
B	163-1	Leach/adsorp/desorpt	R 1 4		08/24/90
		Comments: See comment for 72-4(a).			
	163-1	Leach/adsorp/desorpt	38534	No Decision Yet	
	163-1	Leach/adsorp/desorpt	38535	No Decision Yet	
	163-1	Leach/adsorp/desorpt	38539	No Decision Yet	

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	163-2	Volatility - lab			
B	163-3	Volatility - field			
D	164-1	Terrestrial field di	cr	Required	
Comments: See comment for 161-3.					
D	164-2	Aquatic field dissip	R 1 7	Required	
	164-2	Aquatic field dissip	41482511	Deficient	
Comments: This model study cannot be evaluated because validated environmental fate data have not been submitted therefore, this remains a data gap.					
	164-2	Aquatic field dissip	Misc		
B	164-3	Forest field dissipa			
B	164-5	Long term soil dissi	cr		
Comments: This guideline requirement is reserved.					
D	165-1	Confined rotational		Required	
Comments: See comment for 161-3.					
B	165-2	Field rotational cro			
Comments: This guideline requirement is reserved.					
D	165-3	Accumulation - irrig	CR		
Comments: Data for this guideline is required unless you can prove that the active ingredient and any significant degradates will not contaminate water that may be used for irrigation purposes.					

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	165-4	Bioaccumulation in f	CR 4 7		08/24/90
		Comments: See comment for 72-4(a).			
	165-4	Bioaccumulation in f Misc			
B	165-5	Bioaccum-aquatic non	CR		
		Comments: This guideline requirement is reserved.			
B	166-1	Grd water-small pros			
B	166-2	Grd water-sm. retros			
B	166-3	Grd water-irg retros			
B	201-1	Droplet size spectru			
B	202-1	Drift field evaluati			
B	171-2	Chemical identity	R 1 7		
	171-2	Chemical identity	148769	No Decision Yet	
	171-2	Chemical identity	257123	Bogus Study No.	
	171-2	Chemical identity	Misc		
B	171-3	Directions for use	R 7		
	171-3	Directions for use	Misc		
B	171-5	Reduction of residue			
B	171-4(a)	Nature of residue -			
B	171-4(b)	Nature of residue -			
B	171-4(c)	Res. analyt. method			
B	171-4(d)	Res. analyt. method			

14

U.S. Environmental Protection Agency
Phase 3 Data Dump

Chemical/Case Number 099901 / 2475	Company Number / Name 000707 ROHM & HAAS COMPANY
---------------------------------------	---

STATUS	GDLN #	DESCRIPTION	REGISTRANT'S COMPLIANCE/MRID	EPA DECISION	DATE
B	171-4(e)	Storage stability			
B	171-4(f)	Mag. of res. potable			
B	171-4(g)	Mag. of res. in fish			
B	171-4(h)	Mag. of res. irrigat			
B	171-4(i)	Mag. of res. food ha			
B	171-4(j)	Mag. meat/milk/poult			
B	171-4(k)	Cropfield trials			
B	171-4(l)	Processed food			
B	171-6	Proposed tolerance			
B	171-7	Support for toleranc			
B	171-13	Anal. Reference Stnd			

Comments:

ADDITIONAL REQUIREMENT
Application Exposure

Guideline 234 Estimation of Post-Application
Inhalation Exposure at Indoor Sites
Data GAP

The Agency has chronic toxicological concerns regarding the potential post-application exposure of individuals after the use of paints containing preservatives. Based on this and on evaluation of the use of othilinone in paint, it has been determined that this chemical fulfills the criteria for requesting exposure data as stated in Section 234 of Subdivision U (Pesticide Assessment Guidelines) Therefore, we are requiring this guideline in lieu of conducting long-term chronic toxicology studies in support of reregistration of

U.S. Environmental Protection Agency
Response to Phase 2 Submission

Chemical/Case Number	Company Number / Name
099901 / 2475	000707 ROHM & HAAS COMPANY

GDLN #	DESCRIPTION	REGISTRANT'S REQUEST/MRID	EPA DECISION
--------	-------------	------------------------------	--------------

GDLN Comments Continued:

your products containing othilinone.

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

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