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

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FEB 6 1989

MEMORANDUM

TO: EFGWB File

FROM: S.C. Termes, Chemist

SUBJECT: Telephone Conversation with Ms Wendy Bingemann,
Rohm and Haas Company.
Tel. (215)-592-3425

CHEMICAL: Marine antifoulant C-9211M (Kathon 287)
"RH-5287", 4,5-Dichloro-2-octyl-isothiazole
Shaughnessy No. 128101

On Thursday, February 2, I received a telephone call from Ms Bingemann, Rohm and Haas Company, regarding some questions about metabolite identification in bluegill sunfish.

In an EFGWB review of 11/21/88, the submitted data on metabolite identification was considered inadequate (no attempts were made to identify metabolites in edible portions). The question Ms Bingemann had was if the depuration phase of the study had to be conducted. I recommended that the study should be a new one, starting with the uptake phase that will allow accumulation of pesticide residues/metabolites for their subsequent identification and then carry on the depuration phase. The reason for a complete experiment is to obtain data under the same set of conditions, with a new population of fish, rather than to base the uptake/depuration behavior on the previously submitted, unacceptable study (EFGWB reviews of 12/3/87 and 11/21/88). I also recommended that the pH and the dissolved oxygen content of the water be monitored throughout the study. I was informed that the actual residue/metabolite identification will be performed at Rohm and Haas laboratories.

I also recommended that for the new anaerobic aquatic metabolism study, the pH, E_h, and dissolved oxygen content of the aqueous phase be monitored throughout the study.

cc. John H. Lee
Product Manager #31

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