US ERA ARCHIVE DOCUMENT

MAY 3 1990 Date Out of EFGWB: TO: John H. Lee Product Manager #31 Registration Division (H7505C) FROM: Emil Regelman, Supervisory Chemist Environmental Chemistry Review Section #2 Environmental Fate and Ground Water Branch THRU: Henry M. Jacoby, Chief Environmental Fate and Ground Water Branch/EFED (H7507C) Attached, please find the EFGWB review of: Reg./File #: a) 707-EET; b) 707-EEU; c) 707-EEL Common Name: __Company Code "RH-5287" Chemical Name: 4,5-Dichloro-2-octyl-isothiazole Type product: Mildewcide (Industrial Uses) a) Duracide S Mildewcide (End-use product); b Kathon-287T, Product Name: ____Technical Use; Duracide L Mildewcide (End-use product) Company Name: Rohm & Haas Purpose: Determine if previously submitted data support these uses and. if not, indicate additional data requirements a) 02/14/90; b) 1/10/90 Date Received:_______c) 1/10/90_____ EFGWB #: 90-0442/-0443/-0444 Action Code: 115 Total Reviewing Time (decimal days): 0.8 Deferrals to: ____ Ecological Effects Branch, EFED Science Integration & Policy Staff, EFED ____ Non-Dietary Exposure Branch, HED _____ Dietary Exposure Branch, HED ____ Toxicology Branch I , HED Toxicology Branch II, HED

Shaughnessy No: 128101

1. CHEMICAL:

Common name: None (identified by the company code "RH-5287")

Chemical name: 4,5-dichloro-2-n-octyl-3(H)-isothiazolone

"4,5-dichloro-2-octyl-isothiazole" (As appears at EPA)

Chemical Abstracts Registry #: 64359-81-5

Trade name(s):

Mildewcides......Duracide S and Duracide L

(end-use products)

Kathon 287T (technical product)

Marine Antifoulant.."C-9211M"
Wood Preservative...Kathon 930

Chemical structure:

Formulation(s):

End-use products:

Duracide S......30% active ingredient 70% inert ingredients

Duracide L......26.6% active ingredient 73.4% inert ingredients

Formulation product:

Kathon 287T......93.5% active ingredient 6.5% inert ingredients

Physical/Chemical properties: See review of 1/2/90.

2. STUDY/ACTION TYPE:

Determine if the data previously submitted to the Agency support the uses of the end-use products (Duracide S and Duracide L) and the formulating use product Kathon 287T. If the data submitted does not support these uses, then indicate additional data requirements.

The use of these products is as industrial mildewcides. Duracide S and Duracide L are to be used in paints, coatings, wood stains, adhesives, and construction products. Kathon 287T is to be used only in the formulation of industrial microbiocides.

2

3. STUDY IDENTIFICATION:

- <u>Duracide S Mildewcide</u>
 Letter of Wendy Bingaman (Rohm & Haas) dated 1/5/90 applying for registration of the <u>end-use product</u> Duracide S. Proposed label and and Confidential Statement of Formula provided.
- <u>Kathon 287T</u> *
 Letter of Wendy Bingaman (Rohm & Haas) dated 1/10/90 applying for registration of technical use (formulation) of Kathon 287T. Proposed Label and Confidential Statement of Formula provided.
- <u>Duracide L Mildewcide</u>
 Letter of Wendy Bingaman (Rohm & Haas) dated 1/5/90 applying for registration of the <u>end-use product</u> Duracide L. Proposed label and Confidential Statement of Formula provided.

*NOTE: The registration of Kathon 287T (active ingredient "RH-5287" is being sought independently from those of the manufacturing-use product "RH-5287" in the Marine Antifoulant C-9211M (EPA-707-RTL) and the Wood Preservative Kathon 930 (EPA-707-EEG).

4. REVIEWED BY:

Silvia C. Termes, Chemist Review Section #2 OPP/EFED/EFGWB

5. APPROVED BY:

Emil Regelman Supervisory Chemist Review Section #2 OPP/EFED/EFGWB Signature:

Date:

Signature

Date:

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6. CONCLUSIONS:

It is not clear from the letters or from the proposed labels submitted if the product is going to be used indoors or outdoors. This should be clarified in any label in order to properly determine data requirements.

However, because the products are intended for <u>industrial use only</u>, the (prevention of mildew on paints, coatings, wood stains, caulks, sealants, adhesives, wallpaper pastes, mastics, joint cements and other building and construction products) corresponding general use pattern is <u>indoors</u>. There are no environmental fate data requirements for indoor uses. If the treated materials are to be placed in contact with aquatic environments, then data requirements for aquatic noncrop uses will apply.

For the end-use product Duracide L, it was noticed that one of the components used in the formulation as stabilizer for the active ingredient

is also a known active ingredient. Thus, data should be provided showing that at the amount stated in the formulation this "active ingredient" does not have any pesticidal activity.

7. RECOMMENDATIONS:

The registrant should be informed of the following:

- a) The general use pattern for the proposed industrial use is <u>indoors</u>. There are no environmental fate data requirements for indoor uses.
- b) Data should be provided showing that at the amount the "stabilizer" is used in the formulation, the "stabilizer" does not have any pesticidal activity.

8. BACKGROUND:

Rohm & Haas has applied earlier for registration of the manufacturing use product "RH-5287" as the marine antifoulant agent C-9211M, for which data requirements for aquatic nonfood uses apply (see EFGWB reviews of 11/21/89 and 1/2/90). Rohm & Haas has also requested registration of the manufacturing use product Kathon 930 to formulate wood preservatives for indoor uses (see EFGWB review of 11/17/89).

Rohm & Haas is currently seeking independent registration of Kathon 287T for use in the formulation of industrial mildewcides. Registration of of two end-use mildewcides (Duracide S and Duracide L) is also being sought.

Both Duracide S and Duracide L are recommended for the prevention of mildew on paints, coatings, wood stains, caulks, sealants, adhesives, wall pastes, mastics, joint cement and other building material and construction products. Each product should be added at a level of 1 to 6 lbs per 100 gallons of final product formulation. Actual dosage level will depend on the mildewcide protection required.

- 9. DISCUSSION OF INDIVIDUAL STUDIES: No studies were submitted.
- 10. COMPLETION OF ONE-LINER: No one-liner was completed.
- 11. CBI APPENDIX: Yes.

CBI APPENDIX

In the List of Components in Formulation for the end-product Duracide L, is listed as an stabilizer for the active ingredient. This material is expressed as are known to exhibit pesticidal activity, EFGWB is requesting information showing if there is any pesticidal activity from this component at the amounts stated in the formulation.

INERT INGREDIENT INFORMATION IS NOT INCLUDED