

US EPA ARCHIVE DOCUMENT

2-24-93

DP Barcode : D181136
PC Code No : 128101
EEB Out :

To: John Lee
Product Manager 31
Registration Division (H7505C)

From: Anthony F. Maciorowski, Chief
Ecological Effects Branch/EFED (H7507C)

Attached, please find the EEB review of...

Reg./File # : 000707-RTL
Chemical Name : Dichloro-2-n-octyl-3(2H)-isothiazolone
Type Product : Antifoulant
Product Name : Antifoulant C-9211M; RH-287
Company Name : Rohm and Haas Company
Purpose : Review rebuttals to EEB study reviews of data submitted previously.

Action Code : 116 Date Due : 11/27/92
Reviewer : C. Laird Date In : 07/31/92

EEB Guideline/MRID Summary Table: The review in this package contains an evaluation of the following:

GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT	GDLN NO	MRID NO	CAT
71-1(A)			72-2(A)			72-7(A)		
71-1(B)			72-2(B)			72-7(B)		
71-2(A)			72-3(A)			122-1(A)		
71-2(B)			72-3(B)			122-1(B)		
71-3			72-3(C)			122-2		
71-4(A)			72-3(D)			123-1(A)		
71-4(B)			72-3(E)			123-1(B)		
71-5(A)			72-3(F)			123-2		
71-5(B)			72-4(A)			124-1		
72-1(A)			72-4(B)			124-2		
72-1(B)			72-5			141-1		
72-1(C)			72-6			141-2		
72-1(D)						141-5		

Y=Acceptable (Study satisfied Guideline)/Concur
P=Partial (Study partially fulfilled Guideline but additional information is needed)
S=Supplemental (Study provided useful information but Guideline was not satisfied)
N=Unacceptable (Study was rejected)/Nonconcur

1/3



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

FEB 24 1993

MEMORANDUM

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Registrant Rebuttal to EEB's Review: D181136

FROM: Anthony F. Maciorowski, Chief *Anthony Maciorowski*
Ecological Effects Branch
Environmental Fate and Effects Division (H7507C)

TO: John Lee, PM (31)
Antimicrobial Program Branch
Registration Division (H7505C)

In response to the registrant's letter dated July 15, 1992 concerning the previously reviewed aquatic studies (both freshwater and estuarine/marine) in support of C-9211 M (RH-287 manufacturing use registration), EEB has determined the following:

1. After careful review of the registrant's comments EEB concludes the studies questioned by the registrant retain their original classifications. These are:
 - a. 72-3, Oyster, MRID No. 417568-01: Supplemental
 - b. 72-4, Fish ELS, MRID No. 417415-04: Supplemental
 - c. 72-4, Daphnia chronic, MRID No. 417415-05: Invalid
 - d. 122-2, Algae Acute, MRID No. 417568: Invalid

It should be noted that those studies classified supplemental can be used in an EEB hazard assessment.

2. Although the studies referenced above are not upgradeable, EEB concludes that no further ecological effects data are required for parent compound to support the proposed registration of RH-287 as a marine antifoulant. This conclusion is based on the 02/11/93 review by Environmental Fate and Groundwater Branch (EFGWB). This review indicates that aquatic metabolism studies show: (1) a degradation half-life of less than one hour in marine sediments/seawater systems; (2) degrades bind strongly to

2



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

the sediment phase. Therefore, further EEB aquatic studies, which incorporate test material into the water column, appear inappropriate. However, further ecological effects testing (e.g., with degradates may be required to support registration. This is dependent upon the results of additional EFGWB data: e.g., leaching rates from paint material; clarification of the extent and reversibility of sediment binding.

If you have any questions on the above, please contact Curtis Laird of my staff.