

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DATE: March 29, 1978

SUBJECT: PARANITROPHENOL, Fungicide for Leather. Section 18 Exemption. U.S. Army
Natick Research & Development Command, Natick, Mass. 01760.

FROM: Roland A. Gessert, D.V.M.; Toxicology Branch

TO: Mr. Dick Fournier, Special Registrations Section

Under Section 18 of Amended FIFRA, the Army requests an extension of its exemption from requirements of registration of paranitrophenol for use as a fungicide and fungistatic agent in or on leather articles. An exemption previously was granted 7 June 1977 to expire 16 June 1978. The current request is that the exemption be extended "until such time as paranitrophenol is registered for use or when a suitable alternative registered pesticide becomes available."

Additional studies currently under way may not be completed until as late as 1981, so Toxicology Branch will defer to the product manager the advisability of granting a Section 18 exemption for this period of time.

Toxicology data previously submitted was reviewed by Dr. Reto Engler. No additional data has been received. I concur with Dr. Engler's findings. On the basis of extensive, apparently accident free use of paranitrophenol in past years (even though not previously registered) Dr. Engler recommended for granting the Section 18 exemption, now scheduled to expire 16 June 1978. Toxicology Branch recognizes also a potential hazard of unknown degree from mildew in leather articles not protected with a fungicide.

RECOMMENDATION: Toxicology Branch recommends extending the Section 18 exemption, the duration to be determined by the Product Manager. The treated leather items must include only those which result in no or casual (infrequent) direct skin contact.



Roland A. Gessert, D.V.M.
Toxicology Branch