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

3-2-93

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DP BARCODE: D188195
EFGWB # : 93-0419

MEMORANDUM

SUBJECT: Waiver Request
2-Methyl-4-isothiazolin-3-one (Chemical #107104)
5-Chloro-2-methyl-4-isothiazolin-3-one (Chemical #107103)

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THRU: Emil Regelman, Supervisory Chemist
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3/2/93

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EFGWB cannot concur with the waiver request for Aqueous Availability (168-1-SS) and Photodegradation on Wood Surfaces (168-2-SS) data requirements.

This data is needed to support the registration of the two active ingredients, 2-Methyl-4-isothiazolin-3-one (RH-573) and 5-Chloro-2-methyl-4-isothiazolin-3-one (RH-651) in Kathon WT and Kathon WT 1.5% biocides. One of the major uses of these products is control of surface mold and mildew on wood and wood products such as landscape timbers, fences, posts, pilings, cross ties, decks and similar exterior structures. The only data required for this use pattern is:

161-1 Hydrolysis
168-1-SS Aqueous Availability
168-2-SS Photodegradation on Wood Surfaces

The registrant, Rohm and Haas Company, has requested waivers for the last two data requirements because the registrant believes that

the two active ingredients are used in products which provide only short-term mildew protection to prevent the growth of black mold on pressure-treated wood. The short-term protection is attributed to the low levels of use and short term activity of the active ingredients (<12 weeks). The registrant believes that this loss of activity is due to the rapid degradation of the active ingredients on treated wood surfaces. In support of these arguments, the registrant has provided literature citations to demonstrate the rate and mode of degradation of these chemicals via hydrolysis, photolysis and other biotic processes. EFGWB cannot concur with the waiver request because the results from these studies are inconclusive due to different experimental conditions used than required by the Agency. Furthermore, the special studies (168-1-SS & 168-2-SS) are needed to provide information on the fate of the chemicals and their degradates under the conditions which are similar to the actual use conditions.