

ENVIRONMENTAL PROTECTION AGENCY

PESTICIDES OFFICE

WASHINGTON, D.C. 20250

Pesticides Regulation Division

April 7, 1972

Subject: Toxicity Testing Requirements for Chemicals Used in
Industrial Water Cooling Systems and Air Washer Systems

To: Dr. William H. Preston, Associate Director, Standards Branch

Slimicides that have been registered for use in industrial water cooling systems are apparently being used also for air washer systems although in many cases this use is not specified on the label. The operation of water cooling systems usually involve an outside operation where there is little chance of inhalation exposure; however, operation of air washer systems involve passing air through the slimicide-treated water and then circulating the "cleaned" air into parts of the plant occupied by people. This air may contain the slimicide compound and this would present an inhalation exposure to the building occupants. Since it seems likely that users may assume that registration of a slimicide for use in water coolers also qualifies the product for use in air scrubbing systems labels should be explicit in describing their limitations in this respect. The use of slimicides in air washer systems must be supported by data to indicate that inhalation exposure resulting from this use would be toxicologically insignificant.

Products that are to be used for air washer systems that spray water aerosol or vapor out into the air should be subjected to quantitative chemical analysis for the active ingredient in the room atmospheres under use conditions. If the chemical is present in significant amounts, long-term studies (preferably by inhalation exposure) should be required for continued use. In lieu of the above data, the label should bear a disclaimer for use in air washer systems that spray water into the atmosphere. These tests are in addition to the usual acute and subacute tests required for registration.

It is suggested that the above recommendations be implemented immediately on a product by product basis, but that the policy be outlined for publication as a PR Notice at the earliest possible time.

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