



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

September 13, 1996

MEMORANDUM

SUBJECT: 4,5-Dichloro-2-n-octyl-3(2H)-isothiazolone: NEW USES
PC Code # 128101
ID #000707-EEU-KATHON 287T
Rohm & Haas
DP BARCODE D212647
Case 192535
Submission S478172
Action Code 176

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Rohm & Haas has petitioned new uses for their chemical 4,5-Dichloro-2-n-octyl-3(2H)-isothiazolone. The petition is for use by manufacturers only in formulating microbiocides for use in:

- a. Marine antifoulant paints for boats and/or vessels only.
- b. Plastics preservation
- c. Wood and wood products
- d. Pressure treated wood
- e. Millwork and joinery applications
- f. Protection of wood from sapstain
- g. Industrial recirculating water cooling towers
- h. Industrial recirculating closed loop water cooling systems

- i. Pulp and papermills
- j. Dispersed pigment preservation
- k. Preservation of building materials
- l. Preservation of architectural paints and coatings

The label for KATHONTM indicates that an NPDES permit will be required for effluents containing this product. The only data requirement for microbiocides subjected to an NPDES permit is **Hydrolysis (161-1), which has been satisfied (see below)**. Discharge of effluents from industrial recirculating water towers, industrial recirculating closed-loop water systems and pulp and papermill operations are the uses most likely to be impacted by the need of an NPDES permit. However, this is not clear from the labels.

It is also unclear if treated plastic, wood, millwork and joinery, and architectural paints and coatings will have an indoor or outdoor usage. This should have been clarified in the petition.

The data pertaining the use of KATHON 287T as a manufacturing product in the formulation of marine antifoulant paints has been reviewed by the EFGWB. This is the registered product "SeaNine". It was the recommendation of the EFGWB at that time that "leachability from matrix" studies with the formulated product(s) be conducted and submitted. Similar studies may be necessary for treated plastics, wood, millwork and joinery, and architectural paints and coatings.

It should be noted that the Branch has data other than hydrolysis. This was the result of the registration of the marine antifoulant uses. Although the Registration Division has a copy of the reviews and table of data requirements, a copy of the table is attached to the present review.

TABLE A. Status of Data Requirements for RH-5287.

<u>Data Requirement</u>	<u>MRID #/Review Date</u>	<u>Status/Comments</u>
161-1 Hydrolysis	Accession #249934; 8/11/83	Satisfied ¹
161-2 Photodegradation in Water	41845001; 2/11/93 42772801; This review	Satisfied ¹
162-3 Anaerobic Aquatic Metabolism	41845002; 2/11/93 42341101; 2/11/93	Satisfied ¹
162-4 Aerobic Aquatic Metabolism	41845003; 2/11/93 42341102; 2/11/93 42772802; This review	Satisfied ¹
163-1 Mobility in Soil	41845004; 2/11/93 batch.eq. study, unaged	Satisfied ¹
164-2 Aquatic Field Dissipation	41845005; 2/11/93 soil column leaching, aged	Satisfied ¹
165-4 Bioaccumulation in Fish	Waiver Request, 4/10/91 #265912; 12/3/87 (Uptake/Depuration) 41845006; 2/11/93 (Metabolite identification)	Waived for the manufacturing use formulation only. RESERVED for end-use product (anti- foulant paint). Satisfied

1 Additional information and responses to the EFGWB were provided by the registrant to address deficiencies and/or comments in the 2/11/93 review. The registrant's response is contained in a document by A. Jacobson (Rohm & Haas) entitled "Evaluation of the Environmental Fate of 4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one", completed 5/10/93; No MRID Number.

TABLE A. Data Requirements for RH-5287,

Continued,

<u>Data Requirement</u>	<u>MRID #/Review Date</u>	<u>Status/Comments</u>
165-5 Bioaccumulation in Aquatic Non-target		RESERVED
Surface Water Monitoring		RESERVED
<u>Special Studies:</u> Leaching-from-the-matrix (dynamic study)		REQUIRED for all end-use products (that is, for the antifoulant paints).