

FEB 12 1980

FILE COPY

To: Product Manager 31 Lee
TS-769

FEB 12 1980

Through: Dr. Gunter Zweig, Chief
Environmental Fate Branch

From: Review Section No. 1
Environmental Fate Branch

Attached please find the environmental fate review of:

Reg./File No.: 3876-REU

Chemical: Bis (trichloromethyl)sulfone and Methylene bithiocyanate

Type Product: Microbiocide

Product Name: ER-21

Company Name: Betz Labs

Submission Purpose: conditional registration of new product
containing mixture of two old active ingredients.

EFB # 335 Action Code 11

ZBB Code: 3(C)(7)

Date in: 12/10/79

Date Completed: FEB 12 1980

Deferrals To:

- ☐ Ecological Effects Branch
- ☐ Residue Chemistry Branch
- ☐ Toxicology Branch

1. Introduction

Chemical Name and Type Pesticide: Bis (trichloromethyl)sulfone (17.0% a.i.) and Methylene bithiocyanate (5% a.i.) Microbiocide.

Trade Name: ER-21

This is a request for the conditional registration of a microbiocide, ER-21, that contains two active ingredients, each of which is a registered technical product. One of these active ingredients is used on recirculating water systems, and the other is used in enhanced oil recovery. The proposed ER-21 is to be used in enhanced oil recovery. The company has another registered product, Slime-Trol RX-38A (EPA Reg. No. 3876-111), which is stated to have the exact composition as the proposed ER-21.

2. Directions for Use

For the control of slime-forming bacteria, fungi, algae, and sulfid-producing bacteria in oil field water, polymer, or mycellar floods, water disposal systems. or other oil field water systems, packer fluids and drilling muds. This product may be added to the systems either continuously or intermittently, or as needed.

Do not use in estuarine or at off shore drilling sites.

3. Discussion of Data

No environmental chemistry data was submitted with the application.

4. Recommendations.

Note to PM: The product called ER-21 is claimed by the applicant to be of exact composition of another product by the same applicant, Betz Slime-Trol RX-38A (EPA Reg. No. 3876-111). If EPA File Symbol 3876-REU is the same composition as EPA Reg. No. 3876-111 and the use pattern of 3876-REU is identical or substantially similar to the use pattern of Reg. No. 3876-111, then File Symbol 3876-REU should be considered as a Me-Too. If the composition of the two products is the same but the use patterns are substantially different, then it should be considered a request for conditional registration of new product (not new chemical) and incremental risk assessment would be required. Based upon the information submitted, EFB does not

know if the composition is identical or if the use patterns are substantially similar or substantially different. In addition, the current use patterns of the individually "old" chemicals as cited by the applicant is necessary to make an incremental risk assessment, if that is what is required. Without the above information and further instructions as to what is required from EFB, we are returning the subject document to you without comment.

Herbert L. Manning

Herbert L. Manning, Ph.D.
Review Section #1
Environmental Fate Branch
Hazard Evaluation Division