



January 16, 2020

Department of Ecology
Northwest Regional Office
3190 – 160th Avenue SE
Bellevue, WA 98008-5452

Attention: Jeanne Tran

Dear Jeanne,

As requested, Brooks Manufacturing has gathered supplemental information on the chemical 4,5-Dichloro-2-N-Octyl-4-Isothiazolin-3-One ($C_{11}H_{17}Cl_2NOS$) or 'DCOI' for the Department of Ecology. DCOI has a molecular weight of 281.041 g/mol and the CAS Number is 64359-81-5.

Brooks is expecting the manufacturer to offer DCOI in both solid and liquid-concentrate forms. Based on this expectation, we are anticipating being able to use the solid block form which would mean there would be no process changes from our previous Fact Sheet, section I.A. 'Industrial Processes', for our switchover from Penta. KMG, our Penta supplier, has notified us that they will cease operation at the end of 2021. At this time, our goal is to be able to switch from Penta to DCOI once inventory is depleted.

We have been looking for an accredited lab to perform the testing on our monthly samples. We have not had any success yet, but we are still looking. We also do not have an SDS for DCOI from the manufacturer yet, but we expect it to be available well before the end of 2021.

DCOI has been used for many years worldwide in wood preservation, marine antifouling, cooling tower algacide, and for mold/mildew control in paints and coatings. It is currently under Registration Review with the United States Department of EPA with the final decision scheduled to be issued September, 2020. The EPA's report on DCOI is called "DCOI Final Work Plan, Registration Review: Initial Docket Case Number 5023" EPA-HQ-OPP-2014-0403. This is a very in-depth report on the review

conducted by the EPA. I believe this will have most of the information you are looking for with regards to DCOI. I have also attached presentations from Viance and DuPont with additional information. If you should have any questions, please call.

Thank you,

A handwritten signature in black ink that reads "Kevin Moseley". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Kevin Moseley

Technical Director

kmoseley@brooksmfg.com

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