

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



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES
Antimicrobial Division

July 6, 2006

DP BARCODE: # 330457 Addendum

MRID : #468473-01

SUBJECT: LM 1000 AF
(Name of Product)

REG. NO. OR FILE SYMBOL: 82874-R

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [] OR **End-use Product** [X]

INGREDIENTS (PC Codes): 022501

CAS Number: 7440-50-8

TEST LAB: LumiOre, Inc. and Case Consulting Laboratories, Inc.

SUBMITTER: LumiOre Industrial and Marine Coatings, Inc.

GUIDELINE: Guideline Reference 830 Group A and B

COMMODITIES: not applicable

REVIEWER: Alex Traska

ORGANIZATION: AD

APPROVER: Karen P. Hicks

APPROVED DATE: 7/12/06

COMMENT:

TO: Marshall Swindell
PM Team # 33

FROM: Alex Traska, Chemist
Product Science Branch, CT Team
Antimicrobials Division (7510C)

At 7/12/06

THRU: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510C)



THRU: Michele E. Wingfield, Chief
Product Science Branch
Antimicrobials Division (7510C)

APPLICANT:

Action code : A54 new product, non-fast track

Due out date : 04 Aug 2006

Product Formulation LM 1000 AF (Part A Copper Powder)

Active Ingredient(s): % by wt.

Copper.....99.75

Product Formulation LM 1000 AF (Part B Product Binder)

Other Ingredients.....100%

Finished Product Formulation (LM 1000 AF) Consisting of:

Part A, Part B and Methyl Ethyl Ketone Peroxide (LM 1000 AF)

Active Ingredient(s): % by wt.

Copper..... 55

BACKGROUND:

This resubmission in support of the new product registration, covering the subject three part antifouling coating, was made by Omni Tech International, Ltd. on behalf of the registrant, LumiOre Industrial and Marine Coatings, Inc.

In this resubmission, Omni Tech International, addressed all deficiencies noted in the Product Chemistry Review dated July 7, 2006.

The following documents were submitted and examined in the chemistry review of this submission: agent's e-mail communication to Risk Manager Reviewer, Martha Terry dated 7/12/2006, revised Basic CSF identified with the product name of LM 1000 AF and dated 5/20/05, use instructions marked Part B Marine Coat Binder Mixture not dated and MSDS marked Part B Marine Coat Binder Mixture not dated.

FINDINGS:

1. The product name has been standardized to LM 1000 AF.
2. The certified limits for the active and inert ingredients have been revised and are now acceptable.
3. Registrant corrected the values given in item # 13b of the CSF. Column 13b now totals 100%.
4. Registrant did not provide a full percentage formula disclosure of each ingredient present in the product binder mixture in the Basic CSF. Also CAS registration numbers and supplier sources of each component making-up the binder resin mixture must be provided.
- ✓ 5. The total weight of 1000 lbs should be placed inside box area of item # 17 and not listed in item #14.
- ✓ 6. Item # 4 of the CSF should be completed with the file symbol 82874-R.
- ✓ 7. Item #5 of the CSF should be completed as follows: Marshall Swindell PM 33.
- ✓ 8. Item # 21 of the CSF should be dated with the date of the revision.
- ✓ 9. A complete set of each of the Part A and Part B labels and a current MSDS for LM 1000 AF is requested

CONCLUSIONS:

This resubmission in support of the new product registration the new end-use antifouling coating LM 1000AF, is not accepted.

Registrant must address items #4 through #9 noted in the Findings.