

8/14/1998

SUBJECT: PRODUCT CHEMISTRY REVIEW - Antimicrobials Division
DP Barcode D247618 Reg. No. or File Symbol 2693-RII
Manufacturing-Use [] OR End-Use Product [✓]

TO: Marshall Swindell / Karen Leary-Munk
PM Team No. 33

FROM: Anna Skapars, Chemist
Efficacy and Science Support Branch

THRU: Michelle Wingfield, Acting Chief
Efficacy and Science Support Branch

SUMMARY OF INFORMATION REVIEWED AND FINDINGS

This application is for registration of a new product. Submitted are two CSFs the basic and alternate, each has different brand name.

- A. Three ingredients in each CSF are not in Agency's data base. Therefore registrant should ask his supplier of [REDACTED] and [REDACTED] for these three ingredients complete chemical composition including chemical name, CAS Reg. No. and percentage of each component in each ingredient mixture. Note that enclosed MSDS sheets do not give complete chemical identity.
- B. Both CSFs will be accepted when all ingredients will be cleared by the Agency and pc codes will be assigned.
- C. Provided product chemistry data in MRID No. 445872-01 provides data for Guideline Suis 61, 62 and 63 and data matrix for 63. These data are in compliance with HOCFR part 158.155 through 158.190 and it satisfies product chemistry data for this product.
- D. Confidential Statements of Formule agree with the label.

Anna Skapars
8-14-98

Note to PM:

Please let me know if Copper & Zinc release date is needed?

PRODUCT CHEMISTRY REVIEW

END-USE PRODUCT MANUFACTURING-USE PRODUCT
EPA Reg. No. (or File Symbol No.) 2693-RII

Registration

Reregistration
Case No.: _____

D247618
DP Barcode/Chemist: Anna Skapars

- 1) _____ 3)
2) _____ 4)

1. Product Name: Inter smooth 365 ECODFLEX SPC Antifouling
BEA 363 Dark Brown

2. Company: Courtaulds Coatings, Inc.

3. Type of Submission: New Resubmission Amendment
"ME-TOO" Alternate Formulation REPACK
Expt Use Permit Other (Specify) _____

4. CONFIDENTIAL STATEMENT OF FORMULA

4a. Type of formulation and source registration

- Non-integrated formulation system
- Are all TGAI's used registered • yes • no
- Integrated formulation system
- If "ME-TOO", specify EPA Reg. No. of existing product: _____

4b. Clearance of inerts for non-food or food use:
Cleared for food use under 40CFR§180.1001:

- yes • no . If yes: • c • d • e
- Cleared for non-food use: • yes • no

4c. Physical state of product: Liquid

4d. The chemical IDs, analytical information (including that for the TGAI's), density, pH, and flammability are consistent with that given in GRN 61, 62, and 63-7, 63-12, and 63-15, respectively. • yes • no

- 4e. Density (or bulk density for solids): at °C. *13.54 lbs/gal*
- 4f. pH (if dissolved or dispersed in water): *N/A*
- 4g. Flash point and/or flame extension: *73°F*
- 4h. NCs and CLs are acceptable: • • not acceptable
- 4i. Active ingredient(s) NC LCL UCL
- | | | | |
|--|---------------------|---------------------|---------------------|
| A. <i>Cuprous oxide</i> | <u><i>42.69</i></u> | <u><i>41.40</i></u> | <u><i>43.97</i></u> |
| B. <i>Zinc-2-pyridinethiol 1-oxide</i> | <u><i>3.18</i></u> | <u><i>3.02</i></u> | <u><i>3.33</i></u> |
| C. | | | |
| D. | | | |
- 4j. For products produced by an integrated formulation system:
- All impurities of toxicological significance have an UCL: • yes • no • not applicable
 - All impurities $\geq 0.1\%$ in the product have been identified: • yes • no • not applicable

5. PRODUCT LABEL

- 5a. The active ingredients statement (chemical IDs and NCs) is consistent with the CSF: • yes • no
- 5b. The formulation contains one of the following:
- 10% or more of a petroleum distillate: • yes • no
 - 1% or more of methyl alcohol: • yes • no
 - sodium nitrite at any level: • yes • no
 - a toxic List 1 inert at any level: • yes • no
 - arsenic in any form: • yes • no
- 5c. If yes to any of the above, does the inert ingredients statement contains a footnote indicating this? • yes • no • not applicable
- 5d. The appropriate warning statement regarding flammability or explosive characteristics of the product are given on the label: • yes • no • not applicable

5e. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses: • yes [] • no []

6f. Does the product require an expiration date at which time the NC falls below the LCL (based on the one year storage stability data or other information):
 • yes [] • no []

6. PRODUCT CHEMISTRY (GRN 61, 62, 63)

6a. <u>Chemical IDs/Manufacture/Analytical Information</u>	<u>Accept of Information</u>	<u>MRID No.</u>
61-1 Chemical ID (see Appendix) ¹	A	445872-01
61-2a Manufacturing Process ²	A	
61-2b Formulation Method ³	A	
61-3 Discussion of Impurities ⁴	A	445872-01
62-1 Analysis ⁵		
62-2 Certified Limits ⁶	A	445872-01
62-3 Analytical Method for AIs ⁷	A	

6b. <u>Physical/Chemical Properties</u>	<u>Accept of Data</u>	<u>Value or quality descrip⁵</u>	<u>MRID No.</u>
63-3 Physical State	A	Liquid	445872-01
63-7 Density/Bulk Density (g/cc)	A	13.54 lb/gal	
63-12 pH of product ⁹	N/A		
63-14 Oxid/Red Action	N/A		
67-15a Flash Point (°C) ¹⁰	A	73°F	
63-15b Flame Extension	N/A		
63-16 Explodability	N/A		
63-17 Storage Stability (% degradation of AIs at 20-30 C for ≥ 1 year)			
63-18 Viscosity	N/A		
63-19 Miscibility (with hydrocarbon solvents) ¹¹	N/A		
63-20 Corrosivity (specify metals/conditions)			
63-21 Dielectric Breakdown Voltage ¹²	N/A		

Explanations: A = Acceptable; N = not acceptable; NA = technically not applicable; G = data gap; U = requires upgrading; W = waived; E = EPA estimate.

Footnotes: ¹ See Confidential appendix A for additional information; ² For MP/EP products produced by an integrated formulation system; ³ For products produced from a TGAI or MP; ⁴ May be waived unless actual/possible impurities are of tox concern; ⁵ Five batch analysis required for products produced by an integrated formulation system; ⁶ If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A; ⁷ Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc. ⁸ Provide brief description, e.g., color - yellow or property value, e.g. density 1.25 g/cc. Unless otherwise indicated, the property should be at 25 C; ⁹ If product is a water solution or dispersion; ¹⁰ Not required for aerosols; ¹¹ Emulsifiable liquids only; ¹² For end-use products used near electrical equipment.

Attachment: Confidential Appendix A (page 5).

cc: Reviewer's Name and Central File (Reg. No. or Rereg Case No.)
 1:xxxx:Reviewer's Name:Typist Initials:xx/xx/94:703-308-xxxx:Code (Reg or Rereg No.)
 <PCFORM>

E7505W:RD:RSB:PCRS:CS-

TABLE 1: SUMMARY OF PRODUCT CHEMISTRY DATA REQUIREMENTS

2693-RII

CLR #	TITLES	
Series 61-Product Identity and Composition (40CFR§158.155, 160, 162, 165 & 167)		
61-1	Product Identity & Disclosure of Ingredients	A
61-2	Description of Starting Materials & Manufacturing Process	A
61-3	Discussion of Formation of Impurities	A
Series 62-Analysis and Certification of Product Ingredients (40CFR§158.170, 175 & 180)		
62-1	Preliminary Analysis of Product Samples	
62-2	Certification of Ingredient Limits	A
62-3	Analytical Methods to Verify Certified Limits	A
Series 63-Physical and Chemical Characteristics (40CFR§158.190)		
63-2	Color <i>Dark Brown</i>	A
63-3	Physical State <i>Liquid</i>	A
63-4	Odor	A
63-5	Melting Point	N/A
63-6	Boiling Point	N/A
63-7	Density, Bulk Density, or Specific Gravity <i>13.53 lbs/gal. s.g. 1.625</i>	A
63-8	Solubility	N/A
63-9	Vapor Pressure	N/A
63-10	Dissociation Constant	N/A
63-11	Octanol/Water Partition Coefficient	N/A
63-12	pH	N/A
63-13	Stability	N/A
63-14	Oxidizing or Reducing Action	N/A
63-15	Flammability <i>73°F (Sete Flash)</i>	A
63-16	Explosibility <i>Not potential explosion hazard</i>	A
63-17	Storage stability <i>Six months from date of manufacture</i>	A
63-18	Viscosity <i>1.00 - 1.40 poise</i>	A
63-19	Miscibility <i>miscible w aromatic solvents, glycol ethers + ketones</i>	A
63-20	Corrosion Characteristics	N/A
63-21	Dielectric Breakdown Voltage	N/A

445872-01

CSF

445872-01

- A - Acceptable
- W - Waived
- NA - Not Applicable
- DG - Data Gap

Reviewer: _____

Section Head _____

Date: _____