

7-21-99

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



REVISED

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES
Antimicrobials Division

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:
Intersmooth 360 Ecoloflex SPC Antifouling BEA 368 Dark Brown

DP Barcode:253234 **Reg. No. Or File Symbol: 2693-RIT**
Manufacturing-use [] **OR** **End-use Product [X]**

TO: **Martha Terry**
PM team No. 33

FROM: **Nancy Whyte, Chemist** *new*
Efficacy and Science Support Branch, CTT Team
Antimicrobials Division (7510C)

THRU: **Karen P. Hicks, CT Team Leader**
Efficacy and Science Support Branch
Antimicrobials Division (7510C)

Karen P. Hicks
7/15/99

THRU: **Michele E. Wingfield, Chief**
Efficacy and Science Support Branch
Antimicrobials Division (7510C)

Michele E. Wingfield
7/21/99

DATE: July 14, 1999

BACKGROUND: The registrant in this submission provided through its suppliers data for three inert ingredients, a colorant, a resin, and a [redacted] used in the formula, but not previously approved by the Agency for use in pesticides.

FINDINGS:

1. The name of the colorant, [redacted], has been recently changed since this registration was initially requested. The registrant is using the old name on the Confidential Statement of Formula, and was requested to submit an updated Confidential Statement of Formula which reflects the correct name. The revised Confidential Statement of Formula has not been received by the Agency. The colorant has been approved by the Agency for use in pesticides and has been entered in the Pesticide Chemical code database.

INERT INGREDIENT INFORMATION IS NOT INCLUDED

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2. The inert ingredients [REDACTED] and the polymer have been approved for use in pesticides and have been entered in the Pesticide Chemical code database.
3. The active ingredient cuprous oxide is purchased as a [REDACTED] % product and therefore has an actual activity of 40.41%. The registrant lists a nominal concentration of [REDACTED] % which is the percentage of cuprous oxide used if it was a pure ingredient. The ingredient claims statement on the label lists 40.41%. The actual activity of zinc omadine is 3.8%, as it is purchased with a purity of [REDACTED] %. For compliance with PR Notice 91-2, the Confidential Statement of Formula and the label should have the same nominal concentrations of the active ingredients..

RECOMMENDATIONS:

The Confidential Statement of Formula, dated May 21, 1998, is unacceptable. The registrant should revise the Confidential Statement of Formula to show the following changes:

The actual activity of cuprous oxide and the zinc omadine should reflect the purity of the product. This value should be listed in Box 13b directly below the percentage of the amount used as a part of the total weight and should be the same as the amount of the nominal concentrations claimed in the ingredient claims statement on the label.