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

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DATE: July 14, 1999  Revised July 28, 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 changed since this registration was initially requested. The registrant was 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, dated July 14, has been received by the Agency, and the appropriate corrections made. The colorant has been approved by the Agency for use in pesticides and has been entered in the Pesticide Chemical code database.
2. The inert ingredients 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 product and therefore has an actual activity of 40.41%. The registrant lists a nominal concentration of % 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 %. 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 July 14, 1999 is acceptable with the following addition: The actual purity of the active ingredient (nominal concentration) should be listed in Box 13b under 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.