February 9, 2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:
Intersmooth 360 Ecoloflex SPC Antifouling Paint

DP Barcode: 260476
Manufacturing-use [ ] OR
Reg. No. Or File Symbol: 2693-RIT
End-use Product [X]

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<table>
<thead>
<tr>
<th>Product Formulation</th>
<th>Active Ingredient</th>
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<tbody>
<tr>
<td>Cuprous Oxide</td>
<td>40.41%</td>
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<tr>
<td>Zinc 2-Pyridinethiol 1-oxide (Zinc Pyrithione)</td>
<td>3.80%</td>
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<tr>
<td>Metallic Copper = 36.75%</td>
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BACKGROUND:

The registrant has submitted revised Confidential Statements of Formula for this antifouling paint to correct deficiencies reported by the Agency in response to the original registration request. There is one basic formula and one alternate formula for each of two
colors. One series is used for new vessels (460), the other for maintenance of older vessels (360). The formulations differ only in the addition of one pigment to create a different color, and the very slight variation in the amount of other inert ingredients used when the additional pigment is included.

FINDINGS:

1. All inert ingredients have been approved for use in pesticides.

2. The certified upper and lower limits are within the Agency standards set forth in 40 CFR, Part 158.175 (b)(c).

3. The label claims statement and the Confidential Statements of Formula are in agreement and conform to recommendations of PR Notice 91-2.

4. All the deficiencies cited in the previous review have been addressed and corrected.

RECOMMENDATIONS:

1. The product chemistry requirements for this registration are complete.

2. The Confidential Statements of Formula for the basic dark brown formula and the alternate formulation for the red color (Series 360 and 460), dated October 8, 1999 are acceptable.