

2693-18

10-23-2007

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

OCT 23 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. John P. Pazdera
Pesticide Registration Manager for,
International Paint LLC
2270 Morris Avenue
Union, NJ 07083

Subject: Vinyl-Lux Vinyl Base 340 Antifouling Blue
EPA Registration Number 2693-18
Your Amendment Dated July 27th, 2007
EPA Received Date July 27th, 2007

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, to add four alternate formulations, to revise the "Directions for Use" and to update the precautionary labeling, is acceptable.

The nominal concentrations of the active ingredient given in the proposed four (4) alternate given in the proposed four (4) alternate formulations, all dated 7/27/07, agreed with the percentage declared on the product label.

The certified limits for the active and inert ingredients given in the proposed four (4) new alternate formulations were acceptable.

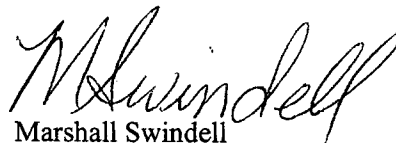
All inert ingredients utilized are acceptable for use in this and other pesticide formulations.

The four alternate formulations are acceptable.

A stamped copy of the labeling is enclosed for your records.

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If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell

Product Manager 33

Regulatory Management Branch I

Antimicrobial Division(7510P)

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Viny-Lux Vinyl-Base 340 Antifouling Blue

Active Ingredient:

Cuprous Oxide = 35.00%

EPA Registration No. 2693-18

Inert Ingredients: = 65.00%

100.00%

EPA Establishment No. 2693-NJ-1

Copper as Metallic = 31.00%

Contains Petroleum Distillates.

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panel for additional precautionary statements

NET CONTENTS: ONE U.S. GALLON (3.785 LITERS)

INTERNATIONAL PAINT LLC
UNION, NJ 07083

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with COMMENTS
in EPA Letter Dated:

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

Causes eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear protective clothing such as gloves, long-sleeved cotton shirt, long pants, and hat. May be fatal if swallowed or inhaled. Do not breathe vapor or spray mist. While spraying paint or sanding or sand blasting boat surfaces, wear a mask or a respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.

If on skin or clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

Other: Have the product container or label with you when calling a poison control center or doctor or going for treatment.

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

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ENVIRONMENTAL HAZARDS

This material is toxic to fish. Do not apply directly to water by cleaning of equipment or disposal of wastes. Do not allow chips and dust generated during paint removal to enter water. Dispose of paint debris in an approved landfill. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARD: Flammable. Keep away from heat and open flame.

STORAGE AND DISPOSAL: Do not contaminate water, food, feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinsate that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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PRODUCT DESCRIPTION: This product is a hard modified epoxy antifouling paint that has been developed to provide effective season-long protection and ease of application. This product is recommended for use on the underwater areas of fiberglass, wood, and properly primed metal (except aluminum) boat hulls. This product can be used in fresh, salt and brackish waters.

COMPATIBILITY: This product can be applied over most other antifouling paints provided they are adhering well to the surface and the surface has been cleaned and sanded. This product can be applied by brush, roller or spray.

Directions for Use

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

V.O.C.: Less than 408 grams/liter
(3.34 lbs./gallon)

THINNER: Interlux® Special Thinner 216 or
Interlux® Brush Ease 433

CLEAN-UP: Interlux® Special Thinner 216 or
Interlux® Brush Ease 433

THEORETICAL COVERAGE: 400 sq. ft./ gallon
yields 2 mils dry film thickness

THINNING: Thin only when necessary.
Do not exceed 10% maximum.

APPLICATION TEMPERATURE: 50°F (10°C)*
and above (air and hull)

ESTIMATED DRY TIMES:

Temperature F°/C°	Touch Dry	Overcoating Time Minimum*	Launch Time Minimum	Maximum
50°F (10°C)	3 hrs	6 hrs	12 hrs	60 days
60°F (15°C)	2 hrs	5 hrs	10 hrs	60 days
75°F (24°C)	1 hr	4 hrs	8 hrs	60 days
95°F (35°C)	30 Min	2 hrs	6 hrs	60 days

*If the air temperature falls below 50°F (10°C) during the 10 hour dry time, extend the dry times to 36 hours minimum.

APPLICATION SYSTEMS

PREVIOUSLY PAINTED - GOOD CONDITION: Remove all traces of loose paint and contamination by sanding the entire surface with 80 grit sandpaper, wipe surface clean with Special Thinner 216. Apply at least two coats of this product.

PREVIOUSLY PAINTED - POOR CONDITION: Completely remove all old antifouling paint, using Interstrip® 299E for fiberglass and wood; and by sandblasting to near white metal for steel.. Follow application system for bare work below.

BARE FIBERGLASS (POLYESTER OR VINYLESTER)

SURFACE PREPARATION: Begin by scrubbing the surface thoroughly with a stiff brush using Interlux All Purpose Boat Soap and water to remove loose dirt and contamination. Flush with fresh water to remove the soap residue and allow to dry. Remove mold release wax using one of the following methods.

The preferred method of cleaning gelcoat is to apply Fiberglass Surface Prep YMA601 with a maroon, 3M, Scotch-Brite® pad and scrub well. Flush with fresh water or wipe off with a clean, wet cloth ensuring that no traces of Fiberglass Surface Prep remain.

An alternate method would be to dampen cheesecloth with Interlux Fiberglass Solvent Wash 202. Wipe thoroughly to remove all surface contamination and cleaners. Wipe off with a clean, dry rag before liquid dries. Wipe only a few square feet at a time and change rags frequently.

To be certain the contamination has been removed, run water over the surface. If the water beads up or separates, repeat one of the above methods. When the water sheets off, all contamination has been removed. Sanding does not remove contamination.

After the surface has been properly cleaned, proceed with the application system below.

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BARE FIBERGLASS - NO SAND SYSTEM: After the surface has been prepared as described above - apply one thin continuous coat of Interlux® Fiberglass No Sand Primer YPA200. Please refer to label directions for application. Allow appropriate dry time and apply the first coat of this product.

BARE FIBERGLASS - SANDING SYSTEM: After the surface has been prepared as described above - Sand entire surface well with 80-grit sandpaper until flat matte finish is obtained. Remember to change sandpaper frequently. Wipe off sanding residue with Fiberglass Solvent Wash 202. Sand and wipe clean. Apply two coats of this product allowing for appropriate dry times.

BARE FIBERGLASS - NO SAND SYSTEM: Clean the surface following the preparation procedure above. Repair any surface imperfections using Interlux® Watertite or Interfill Epoxy Filler. Sand and wipe clean. Apply one thin, continuous coat of Interlux® No-Sand Primer YPA200 by brush or roller. DO NOT SPRAY, DO NOT SAND. Follow label instructions, and apply the first coat of this product.

BARE FIBERGLASS - SANDING SYSTEM: Clean the surface following the preparation procedure above. Sand the entire surface with 80-grit sandpaper and wipe clean with Fiberglass Solvent Wash 202 to remove sanding residue. Repair any surface imperfections with Watertite or Interfill Epoxy Filler. Sand and wipe clean. Apply two coats of this product allowing for appropriate dry times.

BARE WOOD: Sand the entire surface with 80-grit sandpaper; wipe surface clean with Interlux® Special Thinner 216. Repair imperfections with Watertite or Interfill Epoxy Filler. Sand and wipe clean. Apply the first coat of this product thinned 10% with Special Thinner 216 or Brush Ease 433. Fill seams with Interlux® Seam Compound 30 (if necessary). Apply two more coats of this product unthinned, allowing the appropriate dry times.

UNDERWATER METALS: Contact the Interlux® Technical Service Department at 1-800-468-7589 for full information on how to properly prime underwater metals. DO NOT USE ON ALUMINUM.

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