

Y4 2693-127 PM-31

FEB 17 1989

International Paint (USA), Inc.
2270 Morris Avenue
Union, NJ 07083

Attention: Mr. Raymond P. Gangi

Gentlemen:

Subject: Intersmooth HiSol Self Polishing Copolymer A/F
EPA Registration No. 2693-127
Your Submission Dated November 15, 1988
EPA Received Date November 21, 1988

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit/cite all required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Before you release the product for shipment bearing the amended labeling submit an amended Confidential Statement of Formula for your product which demonstrates that your product is within certified limits for TBT release rate which places it within the release rate limit imposed by the Organotin Antifouling Paint Control Act of 1988. Your product was certified as being within the OAPCA limit by the Agency in its letter dated January 30, 1989.

50245;I;Lae;L-3;KENCO;02/02/89;02/14/89;CL;VO;CT

CONCURRENCES

SYMBOL	SURNAME	DATE					

3. Submit acceptable prototype specifications and materials for a certification and training program for the use, disposal, and removal of TBT antifouling paints and paint wastes within 180 days from the date of your application to amend this registration. Your application was dated November 15, 1988. The prototype specifications and materials must be submitted by June 14, 1989. The minimum elements to be addressed in the certification and training program are identified in the Agency's Notice at 53 FR 39038.
4. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. On the right side panel the Storage and Disposal statements must be as below (and given in our letter of March 13, 1986):

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved State and local procedures.

- b. Insert the sentence "Users Must Comply With All Applicable OSHA Requirements" after the "It is unlawful . . ." paragraph and before the "During and after . . ." paragraph.
5. Submit one (1) copy of your final printed labeling before you release the product for shipment bearing the amended labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions. Any existing stock within your possession or control must be restickered to bear labeling approved as part of your conditional registration; all new production must also bear such a label.

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-3-

A stamped copy of the label is enclosed for your records. In order to be acceptable, your label must bear the changes listed at item 4 above.

Sincerely yours,

John H. Lee
Product Manager (31)
Antimicrobial Program Branch
Registration Division (TS-767C)

Enclosure

International



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

DANGER

KEEP OUT OF REACH OF CHILDREN

Corrosive Causes eye irritation and skin burns. When handling wear full protective clothing, rubber gloves, goggles, face shield or other approved eye protection. May be fatal if swallowed or inhaled. Harmful if absorbed through skin. This product may be dermal sensitizer. Avoid contact with skin, eyes or clothing. Remove and wash contaminated clothing before reuse. Avoid breathing of vapor, spray mist, dust or chips from sanding or blasting. Wash thoroughly with soap and water after handling and before eating or smoking. Use with adequate ventilation.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED Drink promptly a large quantity of milk, and egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.

IF IN EYES Flush with plenty of soap and water. Get medical attention.

IF ON SKIN Wash with plenty of soap and water. Get medical attention.

IF INHALED Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

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.

PHYSICAL OR CHEMICAL HAZARDS: FLAMMABLE! Keep away from heat or open flame.

**Intersmooth
HISOL
Self polishing copolymer A/F
BFA254 PLUM SPC**

ACTIVE INGREDIENTS	PERCENT
TRIBUTYL TIN METHACRYLATE (As Part of a Polymer)	8.1%
CUPROUS OXIDE	33.8%
INERT INGREDIENTS	57.9%
	100.0%

ELEMENTAL TIN 2.6% ELEMENTAL COPPER 30.0%
This product contains 1.2 lbs. Tributyltin Methacrylate (as part of a Polymer), and 4.7 lbs. Cuprous Oxide per gallon.

**CONTAINS PETROLEUM DISTILLATES
KEEP OUT OF REACH OF CHILDREN**

Restricted use pesticide due to toxicity to aquatic organisms including shellfish: for sale only to certified commercial applicators and for use only by persons under the direct supervision of an on-site (at the work site) certified commercial applicator. These restrictions become effective on March 1, 1990.

DANGER

See Side Panels for Additional Precautionary Statements

NET 5 U.S. GALLONS

International Paint Company, Inc.

HOUSTON TX 77060 • NEW ORLEANS LA 70118 • SAN FRANCISCO CA 94104 • UNION NJ 07093

DIRECTIONS

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

It is unlawful to use this product on non-hulled vessels less than 82 feet (25 meters) in length (on deck) except for the outboard motor compartment of such vessels.

During and after paint removal and/or application of TBT paint, methods must be employed to prevent release of TBT paints into the environment. Following removal of old TBT paint and/or application of new TBT paint, all paint chips and spent containers, unused paint, and any other debris from paint removal or application must be disposed of in a designated hazardous waste secondary landfill.

Users must comply with all applicable OSHA regulations. NOTE: Wear protective clothing when confined areas or applied by spray or blasting wear a mask or respirator. Mandatory Enforcement and Safety Administration Institute for Occupational Safety and Health.

STORAGE AND HANDLING

Do not contaminate water, food or feed. Open dumping is prohibited. Pesticide that cannot be used or chemically disposed of, according to procedure of local disposal authorities.

Container: Triple rinse for equivalent of conditioning or puncture and recycle or by other approved State or Federal method.

COMMERCIAL USE

EPA REG NO 2693
EPA EST 2693

ACCEPTED
with COMMENTS
in EPA Letter Dated:

7/1/89

Under the Federal Insecticide,
Fungicide and Rodenticide Act as
amended for this pesticide
registered under EPA Reg. No.

2693-127