

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 06 1994

Courtaulds Coatings
400 So. 13th Street
Louisville, KY 40203

Attention: Santosh Bhatt

Subject: Interclene BRA 540
EPA Registration No. 2693-132
Amendment Dated May 11, 1994

The amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes below and submit five copies of final printed labeling.

1. If applicable, indicate the minimum temperature at which the product should be applied.
2. Use your complete product name wherever it appears in the label text.
3. Delete the phrase "Tin Free" from the label, this is an implied safety claim.
4. Ask discussed with the Agency, include the sentence "For use in fresh, salt, and brackish waters." under the General Description section.
5. Revise your storage and disposal statement to read as follows:

STORAGE AND DISPOSAL

Do not contaminate water, food, feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Paint that cannot be used according to label instructions must be disposed of according to federal, state or local procedures under the Resources Conservation and Recovery Act.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

CONTAINER DISPOSAL

Dispose of container by triple rinse and recycling or puncturing and disposing in a sanitary landfill or by other approved State and local procedures. If burned stay out of smoke.

The heading "STORAGE AND DISPOSAL" must be of the same type size as the child hazard warning statement.

6. Revise the "If Swallowed" statement to read "If swallowed, drink promptly a large quantity of water. Avoid Alcohol. Get medical attention."

A stamped copy of the label is enclosed for your records. If you have any questions concerning this letter, contact Martha Terry at (703) 305-6982.

Sincerely yours,



Marshall Swindell
Acting Product Manager 31
Antimicrobial Programs Branch
Registration Division (H7505C)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN
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. Wear a mask or 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.

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 water for 15 minutes. 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 HAZARD: FLAMMABLE! Keep away from heat or open flame.

DIRECTION FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Refer to Product Data sheet for application instructions.

GENERAL DESCRIPTION: This product is an antifouling protective coating resistant to algae, barnacles and other marine foulings.

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

Pesticide, spray mixture, or rinsate that cannot be used or chemically reprocessed should be disposed of according to procedures approved by Federal, State, or local disposal authorities. Container—Triple rinse (or equivalent) and dispose of in an approved landfill. Consult Federal, State, or local disposal authorities for approved alternative procedures.

COURTAULDS COATINGS INC.
HOUSTON, TX ——— UNION, NJ

Inter c
BRA540

**TIN FREE ERODING AN
[FOR COMMERCIAL]**

Active Ingredients:
CUPROUS OXIDE
Inert Ingredients:

**ACCEPTED
with COMMENTS
in EPA Letter Dated:**

JUL 06 1994

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

2693-132

ELEMENTAL CO

**KEEP OUT OF REACH
WARNING**

- See side panel for additional F

EPA Reg. No.: 2693-132

NET FIVE U.S.

DISCLAIMER: The performance of any marine coating depends on many factors outside the control of the manufacturer, including proper application and the environmental conditions. Therefore, Courtaulds Coatings Inc. cannot warrant the performance of this product. IMPLIED WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY ARE HEREBY DISCLAIMED. NOT UNDER ANY CIRCUMSTANCES BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES. The sole and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the

SUBSET A

DIRECTIONS FOR USE CONTINUED

INTERCLEN BRA500 SERIES

INTERCLEN is designed to control a wide range of fouling organisms over extended service periods. The product is formulated with an innovative copper copolymer system which does not use Tributyltin (TBT) as a biocide. Extended protection is possible since performance is directly proportional to the amount of INTERCLEN applied. INTERCLEN releases biocides by the constant exposure of new paint film to the water. Because of this, vessels used regularly experience optimal performance.

SURFACE PREPARATION AND COMPATIBILITY: Surface preparation directions must be followed exactly in order to ensure adhesion. Surface must always be clean and dry prior to painting. INTERCLEN can be applied over most TBT copolymer and traditional long life antifouling paint as long as the old coating has been aged and is tightly adhered and in good condition. This product should not be applied over teflon or graphite type paints.

GENERAL APPLICATION PROCEDURES: A spray is recommended. Tip Size 21-26. Use high pressure spray for large areas. In small areas, brush or roller may be used but the product may be required to achieve the required dry film thickness. It is recommended to apply a dress spray, when required, after 3 full coats of INTERCLEN. It should be noted that although copper copolymer antifouling paints are the most effective copper products available, their performance may, not under all circumstances, match the Tributyltin (TBT) products.

MIXING AND THINNING INSTRUCTIONS: Mix thoroughly with power mixer prior to application. This coating is designed to be applied without thinning. Should thinning be necessary, consult the International Technical Department prior to altering this coating.

CLEAN UP: For tools, equipment, etc. use INTERNATIONAL GTA007.

MINIMUM DRY AND LAUNCHING TIMES: Minimum drying time between coats is 6 hours. Minimum launching time depends on paint thickness at temperature of 73° F.

THEORETICAL COVERAGE: 300 square feet per gallon per coat at 5.0 mils D.F.T. Consult International Technical Department for actual application coverage. Practical square foot coverage per gallon is directly proportional to surface, application techniques and material handling.

APPLICATION SYSTEMS

FOULING COPOLYMER ANTIFOULING SYSTEMS - GOOD HULL CONDITION: High pressure hot water wash with a minimum of 150 PSI to remove all marine growth, slime, etc. to a Near White Metal. Blast entire area to a Near White Metal. Blow down with clean and dry compressed air and spray abrasives. Apply an approved underwater anticorrosive system. **FOR OPTIMUM RESULTS,** blast entire area to a Near White Metal. Apply an approved underwater anticorrosive system. **NEW SHIP CONSTRUCTION:** Blast entire area to a Near White Metal. Blow down with clean and dry compressed air and spray abrasives. Apply an approved underwater anticorrosive system.

DIRECTIONS FOR USE CONTINUED

Interclene

THE PREMIUM COPPER CONTROLLED SOLUBILITY COPOLYMER

(Controlled Solubility Copolymer) is formulated with an innovative copper copolymer system which does not use Tributyltin (TBT) as a biocide. Extended protection is possible, since performance is directly proportional to the amount of INTERCLEN applied. INTERCLEN releases biocide by the constant exposure of new paint film to the water, because of this, vessels used regularly experience optimal performance. INTERCLEN is distinct from MICRON 44 and MICRON 33 since it uses copper as its only biocide to achieve antifouling protection. Please be aware that white (484) may change color at the waterline.

SURFACE PREPARATION AND COMPATIBILITY: Surface preparation directions must be followed exactly in order to insure adhesion. Surface must always be clean and dry prior to painting. INTERCLEN can be applied over all popular antifouling paints as long as the old coating has been aged and is tightly adhered and in sound condition. This product should not be applied over teflon or graphite type paints. When overcoating epoxy primers, be sure to follow label directions carefully to insure proper adhesion.

GENERAL APPLICATION PROCEDURES: Apply at least 3 full coats of INTERCLEN by brush or (solvent resistant) 3/8" nap roller. Do not apply thin coats. Keep in mind that the life of the paint is directly related to the number of coats applied. If during application, brush pulls or roller drags, use 433 INTERLUX BRUSH-EASE to improve handling. Certain areas of the hull experience faster erosion than other areas. These areas include the waterline, the leading edge of the stern and rudder, and the bow stem. On these areas, it is suggested that an additional coat of paint be applied to insure the paint does not wash away before the other areas of the bottom. IT SHOULD BE NOTED THAT ALTHOUGH COPPER COPOLYMER ANTIFOULING PAINTS ARE THE MOST EFFECTIVE COPPER PRODUCTS AVAILABLE, THEIR PERFORMANCE MAY NOT UNDER ALL CIRCUMSTANCES, MATCH THE TRIBUTYL TIN (TBT) COPOLYMERS.

MIXING AND THINNING INSTRUCTIONS: Shake and mix well. Stir continuously while using. Thin only when necessary with 433 INTERLUX BRUSH-EASE or 216 INTERLUX SPECIAL THINNER (not to exceed 10% by volume).

MINIMUM DRY AND LAUNCHING TIMES: Minimum drying time between coats and before launching is 16 hours. Maximum drying time before launching is 60 days. Hull temperature must be at least 50° F or above throughout the drying process.

THEORETICAL COVERAGE: 300 square feet per gallon per coat.

CLEAN UP: For tools, equipment, etc. use 216 INTERLUX SPECIAL THINNER or 433 INTERLUX BRUSH-EASE.

APPLICATION SYSTEMS

PREVIOUSLY PAINTED SURFACES - Good condition: Remove all traces of loose paint and contamination by sanding the entire surface well with 80 grit production paper, wipe surface clean. Apply at least 3 coats of INTERCLEN.

Poor Condition: Completely remove all old antifouling paint with 299 INTERLUX PINTOFF for fiberglass, 159 INTERLUX PINTOFF for wood and by sandblasting steel surfaces to a near white metal. Proceed with application system for bare work as described below.

BARE FIBERGLASS - No Sand System: Wash entire surface thoroughly with 202 INTERLUX FIBERGLASS SOLVENT WASH, changing rags frequently. Before liquid dries, wipe clean with a dry cloth. (Be sure all wax contaminants are removed). Sand any imperfections and repair with 417A/418B EPOXY SURFACING & FAIRING COMPOUND, sand and wipe clean. Apply one thin, continuous coat of AL200 INTERLUX FIBERGLASS PRIMER with brush or roller. Do not spray, do not sand. Allow to cure - between 2-3 hours - no more, no less. Apply 3 or more coats of MICRON CSC.

Sanding System: Wash entire surface thoroughly with 202 INTERLUX FIBERGLASS SOLVENT WASH, changing rags frequently. Before liquid dries, wipe clean with a dry cloth. (Be sure all wax contaminants are removed). Sand any imperfections and repair with 417A/418B EPOXY SURFACING & FAIRING COMPOUND, sand and wipe clean. Sand entire gel coat well with 80 grit production paper until a flat, matte finish is obtained, wipe surface clean. Apply 3 or more coats of MICRON CSC.

BARE WOOD: Sand entire surface thoroughly to a smooth finish with 80 grit production paper, wipe surface clean. Repair imperfections with 417A/418B EPOXY SURFACING & FAIRING COMPOUND, sand and wipe clean. Apply first coat of MICRON CSC reduced with 216 INTERLUX SPECIAL THINNER (10% maximum) to penetrate the wood. Fair seams with 30 INTERLUX SEAM COMPOUND. Apply second and third coats of MICRON CSC unthinned.

ALUMINUM AND STEEL: It is absolutely mandatory to contact the INTERLUX Technical Sales Department for full details on how to properly prime steel and aluminum prior to using this product.

REGISTERED
with COINTEGRITY
in EPA Letter Dated:

JUL 06 1994

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

2693-132