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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 22 1995

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

Attention: Santosh Bhatt

Subject: Interclene BRA 540
EPA Registration No. 2693-132
Amendment Dated March 7, 1995

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. In the "General Application Procedures" section, change "I should be noted. . ." to "It should be noted. . ."
2. In the "General Application Procedures" section, change ". . . are the most effective copper products available..." to ". . . are highly effective. . ."

A stamped copy of your label is enclosed for your records

The agency notes that the alternate use directions (Micron CSC Extra sheet) is to be marketed under the additional brand name "Micron CSC" and an approved alternate color to the yacht market as opposed to the "heavy duty marine" market. When submitting labeling sheets for approval you must use the basic product name throughout the label before it can be accepted. Do not use additional brand names in label submissions to the agency.

If you have any questions concerning this letter please contact Marshall Swindell at 703-305-6908.

Sincerely yours,


Marion Johnson
Product Manager 31
Antimicrobial Programs Branch
Registration Division (7505C)

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

2 8.5

INTERCLEN BRA540 RED

ANTIFOULING

[FOR COMMERCIAL USE ONLY]

Active Ingredient:

Cuprous Oxide = 37.20%

Inert Ingredients: = 62.80%

100.00%

EPA Registration No. 2693-132

EPA establishment No. 2693-TX-1

Elemental Copper = 32.90%

Contains Petroleum Distillates.

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panel for additional precautionary statements

FIVE U.S. GALLONS (18.927 LITERS)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 22 1995

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

2693-132

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PRECAUTIONARY STATEMENTS

WARNING

KEEP OUT OF REACH OF CHILDREN

HAZARD TO HUMANS AND DOMESTIC ANIMALS:

Causes eye irritation. Harmful if swallowed or 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 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 of 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: Promptly drink large quantities of water. Avoid alcohol. Get medical attention.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

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

ENVIRONMENTAL HAZARD

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 public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the 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. 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.

CONTAINER DISPOSAL: Triple rinse (or equivalent). 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.

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

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INTERCLEN BRA SERIES

DIRECTIONS FOR USE:

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

PRODUCT DESCRIPTION: This product is designed to control a wide range of fouling organisms over extended service periods. This product is formulated with a copper copolymer system. Extended protection is possible since performance is directly proportional to the amount of product applied. This product releases biocides by the constant exposure of new paint film to the water. Because of this, vessels used regularly experience optimal performance. It will provide excellent antifouling longevity against all types of algae, weeds, barnacles, and other shell fouling. It can be used below the waterline in fresh, salt or brackish water on fiberglass, wood and properly primed metal boat/ship hulls and parts. This product is for commercial use only.

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. This product can be applied over TBT copolymer and traditional long life 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.

GENERAL APPLICATION PROCEDURES: Airless spray is recommended: Tip Size 21-26 thou. inch. Pump ratio of 30:1 or greater. For small areas, brush or roller may be used but multiple coats may be required to achieve the required dry film thickness. It is recommended to apply by airless spray or two (2) or three (3) full coats of this product. I 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) copolymers.

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 your International representative 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, and before launching is 12 hours depending on paint thickness at temperatures of 73°F.

THEORETICAL COVERAGE: 148 square feet per gallon, per coat a 5.0 mils D.T.F. Consult your International representative for practical application coverage. Practical square foot coverage per gallon, per coat is directly proportional to surface application techniques and climatic conditions.

APPLICATION SYSTEMS

EXISTING COPOLYMER ANTIFOULING SYSTEMS - GOOD HULL CONDITION: High pressure fresh water wash with a minimum of 2500 p.s.i. to remove all marine growth, slime, salts, etc. Spot blast all areas of corrosion to a Near White Metal. Blow down with clean and dry high pressure air to remove all spent abrasives. Apply an approved underwater anticorrosive system. **POOR HULL CONDITIONS:** 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 high pressure air to remove all spent abrasives. Apply an approved underwater anticorrosive system.

DISCLAIMER: The performance of any marine coating depends on many factors outside the control of Courtaulds Coatings Inc. including the surface preparation, proper application and the environmental conditions. Therefore, Courtaulds Coatings Inc. cannot guarantee the suitability of this product for your particular purpose or application. IMPLIED WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY ARE EXCLUDED. COURTAULDS COATINGS INC. SHALL NOT UNDER ANY CIRCUMSTANCES BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES. By purchase or use, of the product, buyer agrees that the sole and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the product at Courtaulds Coatings Inc.'s option.

Union, NJ

ACCEPTED
with COMMENTS
in EPA Letter Dated:

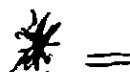
JUN 22 1995

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
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2693-132

Louisville, KY

Houston, TX

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INTERCLEN BRA540

MICRON CSC EXTRA

5 7 5
Alternate language
For Yacht Market.

DIRECTIONS FOR USE:

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

PRODUCT DESCRIPTION: MICRON CSC EXTRA is the newest in a series of multi-season antifouling paints based on Controlled Solubility Copolymer technology. These products are designed to wear away (polish) at a controlled rate similar to 2 bar of soap. As a result there will be a reduced buildup of old coatings and minimized sanding at reapplication. In addition, this technology allows the boat to be hauled and relaunched the following season without repainting. MICRON CSC EXTRA contains high solids and dries to bright colors. It will provide excellent antifouling longevity against all types of algae, weeds, barnacles, and other shell fouling. MICRON CSC EXTRA can be used below the waterline in fresh, salt or brackish water on fiberglass, wood and properly primed metal boat hull and parts. Do not use on aluminum. This product is suitable for commercial and non-commercial applications.

COMPATIBILITY: MICRON CSC EXTRA can be applied over most hard conventional antifouling paints as long as the old coating is tightly adhered and is in sound condition. MICRON CSC EXTRA should not be applied over MICRON 33, MICRON 44 or soft antifouling paints. These old coatings should be removed. MICRON CSC EXTRA is compatible with conventional bottom paints after they have been thoroughly sanded with 80 grit wet or dry sandpaper.

VOC: Less than 400 grams/liter (3.34 lbs/gallon)

THINNER: Brushing - BRUSH-EASE 433

Spraying - SPECIAL THINNER 216

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

CLEAN UP: SPECIAL THINNER 216 OR BRUSH EASE 433

THEORETICAL COVERAGE: 440 square feet per gallon/coat will yield 2 mils dry film thickness.

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

DRYING TIMES: 77°F (25°C) Touch Dry - 2 hours

Dry to overcoat - 16 hours minimum*

Dry to launch - 16 hours minimum*

* If either the air or hull temperature falls below 50°F (10°C) during the 16 hour dry time extend the dry times to a minimum of 48 hours.

APPLICATION SYSTEMS

GENERAL APPLICATION PROCEDURES: Shake or mix well prior to use. Apply at least 2 full coats (3 coats on bare wood) of MICRON CSC EXTRA 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 amount of paint applied. If during application, brush pulls or roller drags, use INTERLUX BRUSH-EASE 433 to improve handling. Certain areas of hull experience faster erosion than other areas. These areas include the waterline, the leading edge of the keel and rudder, and the bow stem. On these areas, it is suggested that an additional coat of paint be applied to insure that the MICRON CSC EXTRA does not wash away before the other areas of the bottom.

PREVIOUSLY PAINTED SURFACES - Good condition: Remove all traces of loose paint and contamination by sanding the entire surface well with 80 grit wet or dry sandpaper; wipe surface clean with INTERLUX SPECIAL THINNER 216. Apply at least 2 coats of MICRON CSC EXTRA, allowing proper dry times.

PREVIOUSLY PAINTED SURFACES - Poor condition: Completely remove all old antifouling paint with INTERLUX PINTOFF 299 for fiberglass, INTERLUX PINTOFF 199 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 INTERLUX FIBERGLASS SOLVENT WASH 202, changing rags frequently. Before liquid dries, wipe clean with a dry cloth. (Be sure all wax and other contaminants are removed). Failure to properly clean the surface will result in paint delamination. Sand any imperfections and repair with INTERLUX EPOXY SURFACING & FAIRING COMPOUND 417A/418B; sand and wipe clean. Apply one thin, continuous coat of INTERLUX AL200 FIBERGLASS PRIMER with brush or roller. Do not spray; do not sand. Allow to cure 2 hours but no more than 3 hours. Apply first coat of MICRON CSC EXTRA and allow to dry overnight. Apply at least one more coat of MICRON CSC EXTRA allowing proper dry times.

BARE FIBERGLASS - Sanding system: Wash entire surface thoroughly with INTERLUX FIBERGLASS SOLVENT WASH 202 changing rags frequently. Before liquid dries, wipe clean with a dry cloth. (Be sure all wax and other contaminants are removed). Failure to properly clean the surface will result in paint delamination. Sand any imperfections and repair with INTERLUX EPOXY SURFACING & FAIRING COMPOUND 417A/418B; sand and wipe clean. Sand entire gelcoat well with 80 grit wet or dry sandpaper until a flat, matte finish is obtained; wipe surface clean with INTERLUX FIBERGLASS SOLVENT WASH 202. Apply 2 or more coats of MICRON CSC EXTRA allowing proper dry times.

BARE WOOD: Sand entire surface thoroughly with 80 grit production sandpaper; wipe surface clean with INTERLUX BRUSH-EASE 433. Repair imperfections with INTERLUX EPOXY SURFACING & FAIRING COMPOUND 417A/418B; sand and wipe clean. Apply first coat of MICRON CSC EXTRA reduced with INTERLUX BRUSH-EASE 433 (10% maximum). Fill seams with INTERLUX SEAM COMPOUND 30 between first and second coats of MICRON CSC EXTRA.

UNDERWATER METALS: Contact INTERLUX Technical Service Department at 1-800-468-7589 for full details on how to properly prime underwater metals. Do not use on aluminum.

NOTE: MICRON CSC EXTRA SHARK WHITE 5584 may change color at the waterline.

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Courtaulds Coatings Inc.
400 S. 13th Street, Louisville, KY 40203

Union, NJ

Louisville, KY

Houston, TX

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