



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

MAR 17 2000

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

International Paint, Inc.
2270 Morris Avenue
Union, NJ 07083

Attention: John Pazdera

Subject: Interclene BRA 540 Red
EPA Registration Number 2693-132
Your Submission Dated October 11, 1999
EPA Received Date October 17, 1999

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to modify the precautionary statements, to revise the "Directions for Use" section, and to add product description to the front panel, is acceptable.

Submit five (5) copies of final printed labels revised in accordance with the following comments.

A. Delete the phrase, "Copper as Metallic = 32.90%, from the product labeling.

B. Delete the term, "Exceptional" from the product labeling.

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

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 (7505C)

2 7 8

INTERCLEN BRA540 RED

Exceptional Antifouling Performance for All Conditions
Controlled Release for Long Lasting Protection
Multi-Season, Self-Polishing, No Buildup
For Fiberglass, Wood or Steel Boats
Haul & Relaunch Without Repainting
Controlled Depletion Polymer Antifouling

[FOR COMMERCIAL USE ONLY]

Active Ingredient:

Cuprous Oxide = 37.20%

EPA Registration No. 2693-132

Inert Ingredients: = 62.80%
100.00%

EPA Establishment No. 2693-NJ-1

Copper as Metallic = 32.90%

Contains Petroleum Distillates.

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panel for additional precautionary statements

NET CONTENTS: FIVE U.S. GALLONS (18.927 LITERS)

ACCEPTED
with COMMENTS
in EPA Letter Dated:

INTERNATIONAL PAINT INC.
UNION, NJ 07083

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

2693-132

**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.

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 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. 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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DIRECTIONS FOR USE:

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

[Subset A – For Heavy Duty Marine Market]

PRODUCT DESCRIPTION: An economical antifouling designed to offer fouling protection against algae, barnacles and other marine foulings for extended periods of time. For use in fresh, salt and brackish waters. Low VOC. This product is for industrial use and professional application only. Not for sale to the general public.

PRODUCT INFORMATION:

Finish/Sheen	Semi-Gloss (ASTM D-523)
Converter	One pack
Volume Solids	60% ± 2% (ASTM D-2697)
Mix Ratio	One pack
Flash Point	79°F (26°C) (Setaflash) (ASTM D-3278)
Film Thickness	4.0 mils (102 microns) dry specified equivalent to 6.7 mils (170 microns) wet. 4.0-5.0 mils (102-127 microns) dry practical range equivalent to 6.7-8.3 mils (170-211 microns) wet.
Theoretical Coverage	240 sq. ft./gal. (4.0 mils (102 microns) DFT) Allow appropriate loss factors.

APPLICATION DETAILS:

Method	Airless spray, brush or roller
Thinner	Not recommended. If necessary use GTA007, see thinning section.
Cleaner	GTA007

Drying Time (hours)	(ASTM D 1640 7.5.1)	Overcoating Interval by			Minimum drying time* before flooding (for 2x5 mil (125 microns) DFT coats)
		Self	(ASTM D-1640 7.8)	Minimum	
Substrate Temperature	Touch			Maximum	
41° F (5°C)	6	12		Indefinite	3 days
77° F (23°C)	4	6		Indefinite	2 days
95° F (35°C)	2	4		Indefinite	1 day

* Refer to your International Representative for minimum drying time before flooding at higher dry film thicknesses and to Limitations section for maximum recommended atmospheric exposure time before flooding.

REGULATORY DATA

VOC: 2.8 lb/gal (336 g/l) as supplied (EPA Method 24)

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SYSTEMS AND COMPATIBILITY: International should be consulted for detailed application advice, specification recommendations and as to the suitability of specific products on individual vessels.

LIMITATIONS: Apply in good weather when air and surface temperatures are above 35°F (2°C). Surface temperatures must be at least 5°F (3°C) above dew point. For optimum application properties, bring material to 70-80°F (21-27°C) temperature range prior to mixing and application. Unmixed material (in closed containers) should be maintained in protected storage between 40° and 100°F (4°-38°C).

Prolonged atmospheric exposure of this product may detract from antifouling performance. Recommended maximum exposure time before flooding:

Temperate conditions 28 days
Tropical conditions 7 days

These times may be extended under certain conditions. Refer to your International Representative for recommendations.

To maximize performance, a minimum of two full coats at the recommended dry film thickness should be applied.

Technical and application data herein is for the purpose of establishing a general guideline of the coating and proper coating application procedures. Test performance results were obtained in a controlled laboratory environment and International makes no claim that the exhibited published test results, or any other tests, accurately represent results actually found in all field environments. As application, environmental and design factors can vary significantly due care should be exercised in the selection, verification of performance, and use of the coating.

SURFACE PREPARATION: Paint only clean, dry surfaces. Remove all grease, oil, soluble contaminants and other detrimental foreign matter by "solvent cleaning" (SSPC-SP1).

New Construction: Dependent on yard procedures, consult International.

Unpainted surfaces: Prepare surface and apply recommended primer. Apply one or more coats of this product as specified. (Consult the relevant primer data sheet for surface preparation and overcoating information.)

Maintenance: Use controlled close high pressure fresh water washing (3,000 psi, 211 kg/sq. cm.) to clean the entire area and remove any leached layer at the surface of the existing antifouling system.

Repair corroded areas with the recommended anticorrosive primer and apply this product within the overcoating interval specified for the primer (consult relevant primer data sheet). Apply the specified number of full coats of this product.

MIXING: This material is a one component coating. Always mix thoroughly with a power agitator before application.

APPLICATION: Apply by airless spray only. Application by other methods, brush or roller, may require more than one coat and is suggested for small areas only or initial stripe coating. Apply 6-7 mils (170 microns) wet which will yield 4.0 mils (100 microns) dry film thickness. Consult the following equipment recommendations or utilize suitable equal.

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Equipment

Brush: Use appropriate size China bristle brush.

Roller: Use All Purpose Roller Cover 3/8" (9.5 mm) pile smooth to medium. Prewash roller cover to remove loose fibers prior to use.

Airless Spray: Minimum 28:1 ratio pump; .021"-.026" (533-660 microns) orifice tip; 3/8" (9.5 mm) ID high pressure material hose; 60 mesh tip filter.

THINNING: DO NOT THIN BEYOND YOUR STATE'S COMPLIANCY. Material is supplied at spray viscosity and normally does not need thinning. If thinning is necessary, thin up to a maximum of 4 ounces (118 ml) per gallon (3.79 lt) with International GTA007 Thinner.

WORK STOPPAGES AND CLEANUP: Clean all equipment immediately after use with International GTA007 Thinner. Spray equipment requires flushing with this solvent. It is good working practice to periodically flush out spray equipment during the course of the working day. Frequency will depend upon factors such as amount sprayed, temperature and elapsed time including work stoppages. Monitor material condition.

WELDING: In the event welding or flame cutting is performed on metal coated with this product, do so in accordance with instruction in ANSI/ASC Z49.1 "Safety in Welding and Cutting."

SAFETY: This product is not to be used without reference to the current relevant Product Data Sheet and Material Safety Data Sheets (MSDS). Prior to use, obtain, consult and follow both the Material Safety and Product Data Sheets for this product concerning both product and health and safety information. Read and follow all precautionary notices on the Material Safety and Product Data Sheets and this container label. If you do not fully understand these warnings and instructions or if you cannot strictly comply with them, do not use this product. Proper ventilation and protective measures must be provided during application and drying to keep solvent vapor concentrations within safe limits and to protect against toxic or oxygen deficient hazards and/or flash fire. Actual safety measures are dependent on application methods and work environment. This safety information is not a substitute for that contained in the Material Safety and Product Data Sheets. Medical Advisory Number 1-800-854-6813.

UN SHIPPING NO: 1263

STORAGE: Store in cool, dry conditions.

Shelf Life One year minimum from date of manufacture when maintained in protected storage at 40-100°F (4-38°C). Subject to reinspection thereafter.

All representations and statements concerning the product on this label are accurate to the best of International's knowledge. Any statements herein are not intended to be specific recommendations or warranties of any product, combination of products or fitness for any particular purpose. Any warranty, if given, or specific Terms and Conditions of Sale are contained in International's Terms and Conditions of Sale. You should request a copy of this document and review it carefully.

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Alternate Directions for Use [Subset B – for Yacht Market]

PRODUCT DESCRIPTION: This product 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 a 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. This product 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. This product 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: This product can be applied over most hard conventional antifouling paints as long as the old coating is tightly adhered and is in sound condition. This product should not be applied over MICRON 33, MICRON 44 or soft antifouling paints. These old coatings should be removed. This product 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) as supplied

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).

DRY 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 36 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 this product 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 pull or roller drags, use INTERLUX BRUSH-EASE 433 to improve handling. Certain areas of hull experience faster polishing 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 this product does not wash away before the other areas of the bottom.

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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 this product 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 this product and allow to dry overnight. Apply at least one more coat of this product 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 this product 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 this product reduced with INTERLUX BRUSH-EASE 433 (10% maximum). Fill seams with INTERLUX SEAM COMPOUND 30 between first and second coats of this product.

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. Color difference may occur between actual paint and color swatch on front of can.

DISCLAIMER: The performance of any marine coating depends on many factors outside the control of International Paint Inc. including the surface preparation, proper application and the environmental conditions. Therefore, International Paint 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. INTERNATIONAL PAINT 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 purchase price or replacement of the product at International Paint Inc.'s option.

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