

2693-142

4-8-1999

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APR 08 1999

Courtaulds Coatings, Inc.
2270 Morris Avenue
Union, N.J. 07803

Attn: John Pazdera
Pesticide Registration Manager

Subject: Interviron ivc BRA640 Red Antifouling
EPA File Symbol No. 2693-142
Amendment Dated February 19, 1999

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, to (a) modify the precautionary statements, (b) to revise the directions for use and © to add statements concerning state registrations and commercial applications to the front panel, is acceptable, provided that you make the following label changes before you release the product for shipment.

1. Revise your "Physical or Chemical Hazard" statement to read "Flammable. Keep away from heat, sparks or open flames".

2. Revise your "Storage and Disposal" statement to read "Pesticide Disposal: Pesticide wastes are toxic. 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".

3. Submit two (2) copies of final printed labeling before you release the product for shipment bearing the amended labeling. A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Enclosure		CONCURRENCES					
SYMBOL							
SURNAME							
DATE							

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INTERVIRON ivc BRA640 RED ANTIFOULING

Eliminates Paint Build-Up and Heavy Sanding
Season Long Protection for Moderate to Heavy Fouling
Overcoats Existing Antifouling Paint

FOR COMMERCIAL USE ONLY

For specific state registrations contact your International Representative

Active Ingredient:		
CUPROUS OXIDE		41.97%
Inert Ingredients:		58.03%
		100.00%

Copper as Metallic = 37.11%

Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN WARNING

- See side panel for additional Precautionary Statements -

EPA Reg. No. 2693-142

EPA Est. No. 2693-NJ-1

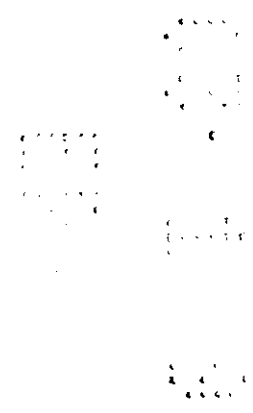
**NET CONTENTS:
FIVE U.S. GALLONS (18.927 LITERS)**

ACCEPTED
with COMMENTS
in EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING**

Under the Federal Insecticide,
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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 sandblasting 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 and other waters unless in accordance with the requirements of a National Pollution 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 or 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 approved state and local procedures.

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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: A high performance, tributyltin free, polishing antifouling resistant to algae, barnacles and other marine foulings. For use in fresh, salt and brackish waters. Prevents coating build-up. At subsequent drydockings, it is only necessary to top up the system. Low VOC. This product is for industrial use and professional application only. Not for sale to the general public.

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PRODUCT INFORMATION:

Finish/Sheen	Semi-Gloss (ASTM D-523)
Converter	One pack
Volume Solids	62% ± 2% (ASTM D-2697)
Mix Ratio	One pack
Flash Point	79°F (26°C) (Setaflash) (ASTM D-3278) 2693-142
Film Thickness	4.0 mils (102 microns) dry specified equivalent to 6.5 mils (165 microns) wet. 4.0-5.0 mils (102-127 microns) dry practical range equivalent to 6.5-8.1 mils (165-206 microns) wet.
Theoretical Coverage	248 sq. ft./gal. (4.0 mils (102 microns)) 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	Maximum	
Substrate Temperature	Touch			
41°F (5°C)	12	24	Indefinite	3 days
73°F (23°C)	6	12	Indefinite	2 days
95°F (35°C)	4	6	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.

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REGULATORY DATA

VOC 3.2 lb/gal. (385 g/l) as supplied
MIL SPEC MIL-P-24647B, Type I, CL IA, Gr A & B, Applications 1 & 2

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 temperature are above 35°F (2°C). Surface temperature 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. Contact your local International Representative for advice.

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).

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Recoating and Upgrading of approved systems: 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 a spot coat of 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 6.5 mils (166 microns) wet which will yield 4.0 mils (102 microns) dry film thickness. Consult the following equipment recommendations or utilize suitable equal.

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 l) 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."

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SAFETY: This product is not to be used without reference to the current relevant Product Data Sheet and Material Safety Data Sheet (MSDS). Prior to use, obtain, consult and follow both the Material Safety and Product Data Sheets for this product for details 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

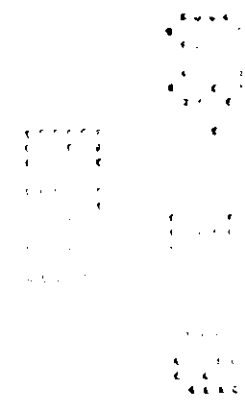
STORAGE: Store in cool, dry conditions.

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 uses Ablative Copolymer Technology to enable it to wash away with use, constantly exposing fresh and effective biocide. This Ablative Copolymer Technology also eliminates the build-up of old spent coatings and the heavy sanding needed to remove them. This product provides season long protection against algae, barnacles and other forms of marine fouling in waters with moderate to heavy fouling. For use in fresh, salt and brackish waters.

COMPATIBILITY: This product can be applied over existing antifouling as long as the old coating is tightly adhered and is in sound condition. When applying over conventional antifouling paints, thoroughly sand with 80 grit wet-or-dry sandpaper. Soft rosin based coatings should be removed prior to application of this product.

V.O.C.: Less than 370 grams/liter

COATS REQUIRED: 2 coats. 3 coats on bare wood.

THINNER: INTERLUX® BRUSH EASE 433

DRY TIMES: Touch dry - 2 hours
77°F (25°C) To Recoat - 16 hours
To Launch - Minimum 16 hours
Maximum - 60 days

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

CLEAN UP: INTERLUX® BRUSH EASE 433

THEORETICAL COVERAGE: 455 sq. ft./gal./coat.

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

APPLICATION SYSTEMS

PREVIOUSLY PAINTED SURFACES - GOOD CONDITION: Remove all traces of loose paint and contamination by sanding the entire surface well with 80 grit sandpaper; wipe surface clean with **Interlux Special Thinner 216**. Stir thoroughly. Touch up bare areas. Apply two full coats of this product by brush or 3/8" nap roller. Do not apply thin coats. If during application, the brush or roller drags, thin with **INTERLUX® BRUSH EASE 433** to improve handling. See compatibility section for additional information.

PREVIOUSLY PAINTED SURFACES - POOR CONDITION: Completely remove all old antifouling paint with **INTERLUX® FIBERGLASS PINTOFF® 299** for fiberglass and epoxy surfaces, **INTERLUX® PINTOFF® 199** for wood and by sandblasting underwater metals to near white metal. Proceed with application system for bare work as described below.

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BARE FIBERGLASS - (POLYESTER or VINYLESTER)

SURFACE PREPARATION: Wash entire surface thoroughly with **INTERLUX® FIBERGLASS SOLVENT WASH 202** changing rags frequently. Before liquid dries, wipe with a clean dry cloth. Be sure all wax and other contamination is removed, failure to properly clean the surface will result in paint delamination. Sand any imperfections and repair with **INTERLUX® SURFACING AND FAIRING COMPOUND 417A/418B**; sand and wipe clean. Sanding does not remove surface contamination.

BARE FIBERGLASS - NO SAND SYSTEM: After the surface has been prepared as described above - Apply one thin continuous coat of **INTERLUX® AL200 FIBERGLASS PRIMER®** with brush or roller. Follow label directions for overcoating. Apply two coats 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 a flat, matte finish is obtained; wipe off sanding residue with **INTERLUX® FIBERGLASS SOLVENT WASH 202™**. Apply two coats of this product.

BARE WOOD: Remove any surface contamination by wiping with **INTERLUX® SPECIAL THINNER 216**. Sand entire surface with 80 grit sandpaper. Wipe off sanding residue with **INTERLUX® SPECIAL THINNER 216**. Repair any imperfections with **INTERLUX® SURFACING AND FAIRING COMPOUND 417A/418B**; sand and wipe clean. Apply first coat of this product reduced with **INTERLUX® BRUSH EASE 433** (10% maximum). Apply two additional coats unreduced. Allow a minimum of 16 hours between coats. Fill seams (if necessary) with **INTERLUX® SEAM COMPOUND 30** between first and second coats of antifouling paint.

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

INTERLUX® For more information call 908-686-1300
or write: Interlux, 2270 Morris Avenue, Union, NJ 07083

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Union, NJ 07083

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