2693-142

9/19/2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

1 9 2012

SEP

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. John Pazdera Pesticide Registration Manager for, International Paint LLC 2270 Morris Ave. Union, New Jersey 07083

Subject: Interviron ivc BRA640 Red Antifouling EPA Registration Number 2693-142 Your Amendment Dated June 20th, 2012 EPA Received Date June 22nd, 2012

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add three alternate formulations and to revise the product labeling, is acceptable.

The Confidential Statements of Formula dated June 20, 2012, are acceptable.

A copy of the stamped labeling is enclosed.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell

Product Manager 33 Regulatory Management Branch I Antimicrobials Division(7510P) Eliminates Paint Build-Up and Heavy Sanding Season Long Protection for Moderate to Heavy Fouling Overcoats Existing Antifouling Paint Reliable Performance at an Excellent Value Season-Long Protection in Moderate to High Fouling Waters

FOR COMMERCIAL USE ONLY

For specific state registrations contact your International Representative

Active Ingredient:	
Cuprous Oxide	41.97%
Inert Ingredients:	<u>58.03%</u>
	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

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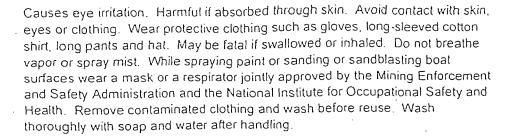
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NET CONTENTS: FIVE U.S. GALLONS (18.927 LITERS)

ACCEPTED with COMMENTS in EPA Letter Dated: SEP 19 2012

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 24073-142

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING



FIRST AID

If Swallowed:

- Immediately call a poison control center or doctor.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give any liquid to the person.
- Do not give anything by mouth to an unconscious person.
- If on skin or clothing:
- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.
 If inhaled:
- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.

Call a poison control center or doctor for further treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

Other: Have the product container or label with you when calling a poison control center or doctor or going for treatment.

Note to Physician: Contains petroleum distillate - vomiting may cause aspiration pneumonia.

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, sparks

STORAGE AND DISPOSAL.

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. 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: Nonrefillable container. Do not reuse or refill this container. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

ACCEPTED with COMMENTS in EPA Letter Dated: SEP 19 2012

Under the Federal Insecticide, Furgicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 2693 - 14-2 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.

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)
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
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		Overcoati	ng Interval b	y ·	ι ι ειιι ιςιι
	(ASTM D)	Self		Minimur	m'drying time
Drying Time (hours)	1640 7.5.1	(ASTM D-1	640 7.8)	théfore f	loodiກ່ຽ (for
Substrate Temperature	Touch	Minimum	Maximum	် 2x5 mil စိုင်ရဲ co	(125 microns) ats)
41°F (5°C)	12	24	Indefinite	oc 2 deys	(((())))))))))))))))))))))))))))))))))
73°F(23°C)	6	12	Indefinite	τι 2 days	L
95°F (35°C)	4	6	Indefinite	1 day	ι ί ίιίις ί

ACCEPTED

Refer to your International Representative for minimum drying with Gow Existing at higher dry film thicknesses and to Limitations section for maximum recommended an Department exposure time before flooding.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, tegistered under EPA Reg. No. 2693-142-

REGULATORY DATA

VOC MIL SPEC 3.2 lb/gal. (385 g/l) as supplied 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 "solver, the 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).

> ACCEPTED with COMMENTS in EPA Letter Dated: SEP 79 20121

Inder the Federal Insecticide, in sphade, and Rodenticide Act as inded, for the pesticide, in pred under EPA Reg. No. 24.93-14.2Recoating 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.

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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 "Safety in Welding and Cutting." ccccc ACCEPTED

with COMMENTS in EPA Letter Dated:

SEP 19 2012

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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.

ACCEPTED with COMMENTS in EPA Letter Dated: 20121 19 CCCCC Pederal Insecticide. . L'LL id Hodenticide Act as and and i EPA Reg. No. 24 93-142

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.

wood.

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

THINNER: INTERLUX® BRUSH EASE 433

THINNING: Thin only if necessary. Do not exceed 10% by volume. DRY TIMES: Touch dry - 2 hours 77°F (25°C) To Recoat - 16 hours

COATS REQUIRED: 2 coats, 3 coats on bare

To Launch - Minimum 16 hours Maximum - 60 days

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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 is 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.

ACCEPTED

with COMMENTS in EPA Letter Dated: SEP 179 20121 Under the Federal Insecticide, Fungicide, and Rodenticide Act as

un to and not the pesticide, to EPA Reg. No. 2493-142

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 <u>not</u> 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 202TM. 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 <u>not</u> use on aluminum.

> INTERLUX® For more information call 908-686-1300 or write: Interlux, 2270 Morris Avenue, Union, NFのどび83

> > International Partian Dated:

SEP 179 2012 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 2693-142 *c*ecce

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

PRODUCT DESCRIPTION:

This product is performance, value and reliability all in one. This product is an allpurpose, low V.O.C. antifouling paint formulated to erode away with use reducing paint build-up. This product provides season-long protection in moderate to high fouling waters and can be applied directly over most properly prepared antifouling paints. Recommended for use on the underwater areas of fiberglass, wood, and properly primed metal (except aluminum) boat hulls and can be used in fresh, salt and brackish waters.

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

NOTE: Colors may fade or change above the waterline. Stir well before and during use, can be applied by brush, roller or spray. **Do not use on aluminum**.

COMPATIBILITY: This product can be applied over most other antifouling paints provided the old coating is tightly adhered, is in sound condition and has been thoroughly sanded with 80 grit wet-or-dry sandpaper.

V.O.C.: Less than 330 grams/liter (2.75 lbs. /gal.)	THEORETICAL COVERAGE: 455 sq. feet/gal at 3.6 mils WFT and 2 mils DFT
CLEAN UP: Acetone or Xylene ¹ THINNER: Xylene ² (thin only when necessary, do not exceed 10% by volume)	APPLICATION TEMPERATURE: 50° F (10° C)* and above (air and hull).

Temperature	Touch Dry	Over-Coating Time	Immersion Time	
°F (°C)		Minimum	Minimum	Maximum
50° F (10° C)	3 Hours	12 Hours	16 Hours	60 Days
77° F (25° C)	2 Hours	6 Hours	16 Hours	60 Days
95° F (35° C)	1 Hours	4 Hours	16 Hours	60 Days

ESTIMATED DRY TIMES:

*If the air temperature falls below 50° F (10° C) during the dry time extend the dry times 50° F (10° C) during the dry times 50° F (10

PREPARATION/APPLICATION

BARE FIBERGLASS: Scrub the surface thoroughly with a stiff brush using soap and water. Flush with fresh water to remove the soap residue and allow surface to dry. Remove mold release wax and surface contamination by wiping down the surface with Xylene¹ using the two-rag method. Fill any surface imperfections with approved filler for underwater use. Sand the entire surface with 80-grit sandpaper until a flat matter finish is obtained. Wipe the sanding residue off the surface with Xylene¹ using the two-rag method. Fill any surface with 80-grit sandpaper until a flat matter finish is obtained. Wipe the sanding residue off the surface with COMMENTS are method. Apply two coats of this product allow the total product allow to approve the total product allow the total product allow to approve the total product allow the total product allow to approve to the total product allow to approve to the total product allow to the to

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PREVIOUSLY PAINTED SURFACE - GOOD CONDITION: Remove all traces of loose paint by sanding the entire surface with 80 grit wet-or-dry sandpaper; wipe surface clean with Xylene¹ using the two-rag method before and after sanding. Apply two coats of this product allowing for appropriate dry times.

PREVIOUSLY PAINTED SURFACE - POOR CONDITION: Completely remove old antifouling paint, after all old antifouling paint has been completely removed, sanding the entire surface with 80 grit wet-or-dry sandpaper; wipe surface clean with Xylene¹ using the two-rag method before and after sanding. Apply two coats of this product allowing for appropriate dry times.

BARE WOOD: Sand the entire surface with 80 grit wet-or-dry sandpaper; wipe surface clean with Xylene¹ using the two-rag method before and after sanding. Apply the first coat of this product thinned 10% with Xylene². Apply two finish coats of this product allowing for appropriate dry times.

UNDERWATER METALS: Apply an approved underwater metal primer as per manufacturer's instructions. Apply two coats of this product allowing for appropriate dry times. **Do not use on aluminum**.

MAINTENANCE

Antifoulings are not effective under all conditions. Pollution, usage and natural occurrences can adversely affect an antifouling paint's performance. Therefore, we strongly suggest that the antifouling paints are checked regularly to make sure it is clean and that no growth is occurring. The less a boat is used, and the longer the idle periods are the higher the chance of fouling. Properly functioning antifouling paints will repel hard growth and requires only occasional light wiping with a soft cloth or Scotch-BriteTM pad to remove slime. Aggressive cleaning of antifouling paints, using tools such as scrubbing pads and brushes, will shorten the effective life of the paint, and should only be used if necessary.

¹ May not be an approved solvent for use in all areas.

² Thinning of this product may affect the V.O.C. compliance of this product. Please consult your local government regulations for recommendations for volatile organic compound (VOC) limits.

ACCEPTED with COMMENTS in EPA Letter Dated:

Under the Federal Insecticide, Fungicide, and Rodenticide Act as americaed, for the pesticide, registered under EPA Reg. No. 3693-142....

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