

2693-142

9/19/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

SEP 19 2012

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 20<sup>th</sup>, 2012  
EPA Received Date June 22<sup>nd</sup>, 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,

A handwritten signature in black ink that reads "M. Swindell".

Marshall Swindell  
Product Manager 33  
Regulatory Management Branch I  
Antimicrobials Division(7510P)



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 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.

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.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
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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 or open flames.

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 1/4 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.

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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.

**PRODUCT INFORMATION:**

<b>Finish/Sheen</b>	Semi-Gloss (ASTM D-523)
<b>Converter</b>	One pack
<b>Volume Solids</b>	62% ± 2% (ASTM D-2697)
<b>Mix Ratio</b>	One pack
<b>Flash Point</b>	79°F (26°C) (Setaflash) (ASTM D-3278)
<b>Film Thickness</b>	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.
<b>Theoretical Coverage</b>	248 sq. ft./gal. (4.0 mils (102 microns) ) <b>Allow appropriate loss factors.</b>

**APPLICATION DETAILS:**

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

Drying Time (hours)	(ASTM D)	Overcoating Interval by		Minimum drying time before flooding (for 2x5 mil (125 microns) DF4 coats)
		Self	(ASTM D-1640 7.8)	
Substrate Temperature	Touch	Minimum	Maximum	
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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### 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

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

To Launch - Minimum 16 hours  
Maximum - 60 days

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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### 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 all-purpose, 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.

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

#### ESTIMATED DRY TIMES:

Temperature	Touch Dry	Over-Coating Time	Immersion Time	
			Minimum	Maximum
°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

\*If the air temperature falls below 50° F (10° C) during the dry time extend the dry times by 12 hours minimum.

#### 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 Xylene<sup>1</sup> 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 matte finish is obtained. Wipe the sanding residue off the surface with Xylene<sup>1</sup> using the two-rag method. Apply two coats of this product allowing for appropriate dry times.

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