

2693-142

12/5/2012

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



Office of Pesticide Programs

DEC - 5 2012

International Paints, LLC
2270 Morris Avenue
Union, N. J. 07083

Attention: John P. Pazdera
Pesticide Registration Manager

Subject: Interviron ivc BRA640 Red Antifouling
EPA Registration No. 2693-142
Notification Dated November 16, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification

- Minor Label Change

General Comments

Based on a review of the submitted material, the following comments apply:

The Notification to add the following phrase (Performance, value and reliability) to the label is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

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
Antimicrobials Division (7510P)

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United States Environmental Protection Agency Washington, DC 20460

Registration
Amendment
[X] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: 2693-142
2. EPA Product Manager: M Swindell
3. Proposed Classification: [X] None [] Restricted
4. Company/Product (Name): Interviron ivc BRA640 Red Antifouling
5. Name and Address of Applicant: International Paint LLC, 2270 Morris Ave, Union NJ 07083
6. Expedited Review: In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

Amendment - Explain below.
Resubmission in response to Agency letter dated
[X] Notification - Explain below.
Final printed labels in response to Agency letter dated
'Me Too' Application.
Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification - Minor Label Change: add phrase "Performance, value and reliability" to front panel

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container: Metal, Plastic, Glass, Paper, Other (Specify)
3. Location of Net Contents Information: Label, Container
4. Size(s) Retail Container
5. Location of Labels: On Label, On Labeling accompanying Product
6. Manner in Which Label is Affixed to Product: Lithograph, Paper glued, Stenciled, Other

Section - IV

1. Contact Point: Name: John P Pazdera, Title: Pesticide Regis. Mgr, Telephone No.: 908 964 2288
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: John P. Pazdera
3. Title: Pesticide Regis Mgr
4. Typed Name: John P Pazdera
5. Date: Nov 16, 2012
6. Date Application Received (Stamped)



AkzoNobel

Tomorrow's Answers Today

Mr. Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7504P)
U.S. EPA
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Via Federal Express

November 16, 2012

Re: Interviron ivc BRA640 Red Antifouling
EPA Reg. No. 2693-142
Notification – Minor Label Change

Dear Mr. Swindell:

The enclosed Notification pertains to our product, Interviron ivc BRA640 Red Antifouling, EPA Reg. No. 2693-142. Specifically, we wish to add the following phrase to the product label front panel:

- "Performance, value and reliability"

No other changes are being made.

As this is a Notification as described in PR Notice 98-10, no registration service fee is required.

Enclosed, therefore, please find:

- EPA Form 8750-1
- Five (5) copies of revised labeling
- Copy of EPA stamped label dated 9/19/12
- Certification Statement

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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
Reliable Performance at an Excellent Value
Season-Long Protection in Moderate to High Fouling Waters
Performance, value and reliability

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.

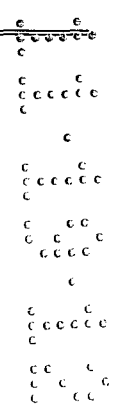
KEEP OUT OF REACH OF CHILDREN WARNING

- See side panel for additional Precautionary Statements -

EPA Reg. No. 2693-142

EPA Est. No. 2693-NJ-1

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



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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:

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

Drying Time (hours)	Substrate Temperature	Overcoating Interval by			Minimum drying time before flooding (for 2x5 mil (125 microns) DFT coats)
		(ASTM D) 1640 7.5.1 Touch	Self (ASTM D-1640 7.8) 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).

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
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

International Paint LLC
Union, NJ 07083

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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.

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).

ESTIMATED DRY TIMES:

Temperature °F (°C)	Touch Dry	Over-Coating Time Minimum	Immersion Time	
			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 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 matte finish is obtained. Wipe the sanding residue off the surface with Xylene¹ using the two-rag method. Apply two coats of this product allowing for appropriate dry times.

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-Brite™ 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.

