



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 M St., S.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:

- Registration
- Reregistration

(under FIFRA, as amended)

EPA Reg. Number:

2693-187

Date of Issuance

SEP 07 2000

Term of Issuance: **Conditional,**
Expires 3/17/2003

Name of Pesticide Product: **Intersmooth**
360 Ecoloflex Spc Antifouling
BEA 368

Name and Address of Registrant (include ZIP Code):

International Paint, Inc.
2270 Morris Avenue
Union, N.J. 07083

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. Make the following label changes:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. "2693-187".

Signature of Approving Official:

Marshall Swindell, PM 33
Regulatory Management Branch 1
Antimicrobial Division (7510C)

Date

SEP 07 2000

- 3. Submit the following “required” studies by 09/17/2001.

Studies on the Zinc Omadine Technical Grade Active

Ecological Effects:

- GLN 72-4 Fish Early Life Stage (Estuarine Fish Study)
- GLN 73-1 Whole Sediment Acute, Freshwater Invertebrates
- GLN 73-2 Whole Sediment Acute, Marine Invertebrates
- GLN 123-2 Aquatic Plant Growth (4 species: Navicula, Anabaena, Lemma, Scenedesmus)
- GLN 163-1 Soil Column
- GLN 165-4 Bioaccumulation (Fish)

Toxicological Effects

- GLN 81-7 Acute Neurotoxicity – Hen
- GLN 82-5 Subchronic 90 Day Neurotoxicity

Exposure Effects

- GLN 875.1100 Dermal Exposure (Outdoor)
- GLN 875.1600 Inhalation Exposure (Outdoor)
- GLN 875.1300 Dermal Exposure (Indoor)
- GLN 875.1400 Inhalation Exposure (Indoor)

- 4. Submit the following study by 9/17/2002.

GLN 83-4 Two Generation Reproduction (For Residential Uses)

- 5. Submit quarterly progress reports on the status of each data requirement.

6. Submit the following “reserved” studies within 12 months of the date of the Agency’s written request for these data. The need for these reserved data will be based upon the results of one or more of the above studies as determined by the Agency.

- GLN 72-5 Fish Life Cycle
- GLN 72-6 Aquatic organism bioavailability/biomagnification/toxicity tests
- GLN 72-7 Simulated or actual field testing for aquatic organisms
- GLN 71-4 Avian Reproduction

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EPA Registration No. 2693-187


- GLN 73-3 Acute Pore Water Studies (fish and invertebrates)
- GLN 74-1 Whole Sediment Chronic Study (invertebrates)
- GLN 123-1 Seedling Emergence-Dose Response Test
- Special Study: Monitoring of Representative U.S. Waters
- GLN 162-1 Aerobic Soil Metabolism
- GLN 162-2 Anaerobic Soil Metabolism
- GLN 164-2 Aquatic Field Study
- GLN 165-5 Accumulation Study (Nontarget organism)
- GLN (Not Assigned) Monitoring of Representative US Waters

This conditional registration will expire automatically on 3/17/2003. If you fail to satisfy the conditions imposed in the registration, EPA may issue a Notice of Registration to Cancel under Section 6(e) of FIFRA. Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label 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

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ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 07 2000

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

2693-187

Product Identity

Intersmooth® 360 Ecoloflex SPC Antifouling

Order Number

BEA368 Dark Brown FOR COMMERCIAL USE ONLY

Active Ingredients:

CUPROUS OXIDE	40.41%
ZINC 2-PYRIDINETHIOL 1-OXIDE*	3.80%

Inert Ingredients:

55.79%

100.00%

COPPER AS METALLIC = 36.57%

Contains petroleum distillates.

*Zinc Pyrithione

KEEP OUT OF REACH OF CHILDREN

WARNING

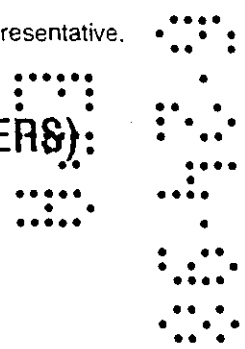
- See side panel for additional Precautionary Statement -

EPA Reg. No.: 2693-

EPA Est. No.: 2693-NJ-1

For specific state registrations contact your International Representative.

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



REGISTERED
WITH THE DEPARTMENT
IN EPA Master File

SEP 07 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
2693-187

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
KEEP OUT OF REACH OF CHILDREN
WARNING**

Causes eye and skin irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wear protective clothing such as protective eyewear, gloves, long-sleeved cotton shirt, long pants, and hat. Harmful if swallowed or inhaled. Do not breathe dust, vapor or spray mist. Wear a mask or 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: Drink large quantity of water. Avoid alcohol. Get medical attention.

IF IN EYES: Immediately flush with water for at least 15 minutes. 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.

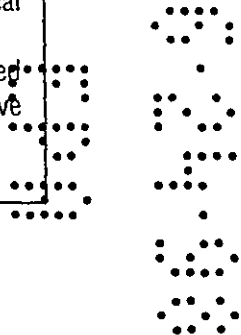
ENVIRONMENTAL HAZARDS: This material is toxic to fish. Do not apply directly to water by cleaning of equipment or disposal of wastes. Do not allow chips and dust generated during paint removal to enter water. Dispose of paint debris in an approved landfill. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent to sewer system 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 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.

CONTAINER DISPOSAL: Triple rinse (or equivalent) and dispose of in an approved landfill. Consult Federal, State or local disposal authorities for approved alternative procedures.



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Approved
with amendments
in EPA Letter Dated:

SEP 07 2000

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

2693-187

DIRECTIONS FOR USE:

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

PRODUCT DESCRIPTION: A high performance tin-free self polishing copolymer antifouling for coastal vessels.

- Copper acrylate patented polishing technology
- Special boosting biocide package

This product is for industrial use and professional application only. Not for sale to general public.

PRODUCT INFORMATION:

Finish/Sheen	Semi-Gloss (ASTM D-523)
Converter	One pack
Volume Solids	40% ± 2% (ASTM D-2697)
Mix Ratio	One pack
Flash Point	73°F (23°C) (Setaflash) (ASTM D-3278)
Film Thickness	5.0 mils (127 microns) dry specified equivalent to 12.5 mils (318 microns) wet 3.0-6.0 mils (76-152 microns) dry practical range equivalent to 7.5-15.0 mils (190-380 microns) wet
Theoretical Coverage	128 sq. ft./gal. (5.0 mils (127 microns) DFT) Allow appropriate loss factors.

APPLICATION DETAILS:

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

		<i>Overcoating Interval By</i>		
	ASTM D	Self		
	1640 7.5.1)	(ASTM D - 1640 7.8)		
	Touch	<i>Minimum</i>	<i>Maximum</i>	<i>Minimum drying time* before flooding</i> <i>(for 2x5 mil [127 microns] DFT coats)</i>
Drying Time (hours)	1	6	1 month	18
Substrate Temperature	40 mins	4	1 month	12
41°F (5°C)	30 mins	3	1 month	10
73°F (23°C)				
95°F (35°C)				

* 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 4.33 lb/gal (520 g/l) as supplied (EPA Method 24)

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

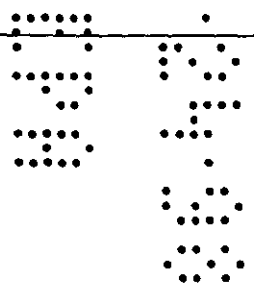
LIMITATIONS: Apply in good weather when air and surface temperatures are above 35°F (2°C). Surface temperature must be at least 5°F (3°C) above dew point. For optimum application properties, bring material to 70-80°F (21-27°C) temperature range prior to mixing and application. Unmixed material (in closed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

The performance of this product is dependent upon the specified film thickness being achieved. Recommended maximum exposure time before flooding: Temperate conditions: up to 1 month, Tropical conditions: up to 1 month.

If these periods are exceeded the antifouling performance may be impaired. On immersion, Intersmooth 360 Ecoloflex SPC will exhibit a slight color change. Consult International for overcoating Intersmooth 360 Ecoloflex SPC with organotin copolymer antifouling.

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 representation 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).



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Unpainted surfaces: Prepare surface and apply recommended primer. Apply one or more coats of Intersmooth 360 Ecoloflex PC as specified. (Consult the relevant primer data sheet for surface preparation and overcoating information.)

Maintenance: Application of Intersmooth 360 Ecoloflex SPC over self: Use controlled close high pressure fresh water washing (1,000 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 Intersmooth 360 Ecoloflex SPC within the overcoating interval specified for the primer (consult relevant primer data sheet for surface preparation and overcoating information).

Apply the specified number of full coats of Intersmooth 360 Ecoloflex SPC.

Application of Intersmooth 360 Ecoloflex SPC over other antifouling substrates: Consult International.

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

APPLICATION: Apply by airless spray. Application by other methods, brush or roller, may require more than one coat and is suggested for small areas only. Apply 12.5 mils (318 microns) wet which will yield 5.0 mils (127 microns) dry film thickness. Consult the following equipment recommendations or utilize suitable equal.

Equipment

Airless Spray: Minimum 28:1 ratio pump: .018" - .026" (457-660 microns) orifice tip: 3/8" (9.5 mm) ID high pressure material hose; 60 mesh tip filter.

THINNING: 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 ANSVASC 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 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.

Material Advisory Number: 1-800-854-6813

UNIVERSITY SHIPPING NO: 1263

STORAGE: Shelf Life 6 months minimum from date of manufacture when maintained in protected storage at 40-95°F (4-35°C). Subject to reinspection thereafter.
Store in cool, dry conditions.

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.

International and Intersmooth are registered trademarks of Courtaulds Coatings (Holdings) Ltd.
Copyright© 1998 Courtaulds Coatings (Holdings) Ltd.
Ecoloflex is a trademark of Nippon Paint Company Ltd.

Rev. 5/98



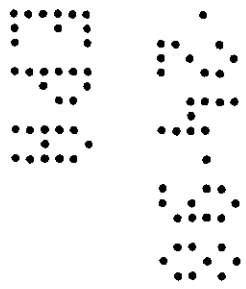
Courtaulds Coatings, Inc.
2270 Morris Ave, Union, NJ 07083
Union, NJ • Houston, TX • Louisville, KY

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 07 2000

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

2693-187





Intersmooth® 360 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antifouling

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 07 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
2693-187

INTENDED USES At Maintenance and Repair drydocking.

PRODUCT DESCRIPTION A high performance tin-free self polishing copolymer antifouling for coastal vessels.
• Copper acrylate patented polishing technology
• Special boosting biocide package

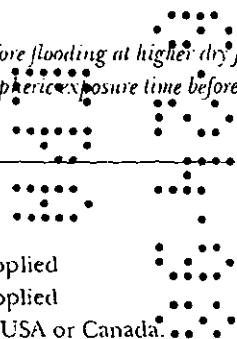
PRODUCT INFORMATION	Color	BEA368 Dark Brown, BEA369 Dark Red.
	Finish/Sheen	Semi-Gloss (ASTM D-523)
	Converter	One pack
	Volume Solids	40% ± 2% (ASTM D-2697)
	Mix Ratio	One pack
	Flash Point	73°F (23°C) (Sciallash) (ASTM D-3278)
	Film Thickness	5.0 mils (127 microns) dry specified equivalent to 12.5 mils (318 microns) wet 3.0-6.0 mils (76-152 microns) dry practical range equivalent to 7.5-15.0 mils (190-380 microns) wet
	Theoretical Coverage	128 sq. ft./gal. (5.0 mils (127 microns) DFT) Allow appropriate loss factors.

APPLICATION DETAILS	Method	Airless spray
	Induction/Sweat-in Time	Not applicable
	Thinner	Not recommended. If necessary use GTA907, see thinning section.
	Cleaner	GTA007
	Pot Life	Not applicable

Drying Time (hours)	ASTM D 1640 (7.5.1)	Overcoating Interval By		Minimum drying time* before flooding (for 2x5 mil [127 microns] DFT coats)
		Self	ASTM D 1640 (7.8)	
Substrate Temperature	Touch	Minimum	Maximum	
41°F (5°C)	1	6	1 month	18
73°F (23°C)	40 mins	4	1 month	12
95°F (35°C)	30 mins	3	1 month	10

*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	BEA368 4.33 lb/gal (520 g/l) as supplied BEA369 4.33 lb/gal (520 g/l) as supplied
	EPA	This product is not registered in the USA or Canada. See Page 4 for additional regulatory data.



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100001
WB-00001001
in EPA Letter Data

SEP 07 2000

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

2693-187

Intersmooth® 360 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antifouling

SYSTEMS AND COMPATIBILITY

Consult your International Representative for the system best suited for surfaces to be protected.

LIMITATIONS

Apply in good weather when air and surface temperatures 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).

The performance of this product is dependent upon the specified film thickness being achieved.

Recommended maximum exposure time before flooding:

- Temperate conditions: up to 1 month
- Tropical conditions: up to 1 month

If these periods are exceeded the antifouling performance may be impaired. On immersion, Intersmooth 360 Ecoloflex SPC will exhibit a slight color change. Consult International for overcoating Intersmooth 360 Ecoloflex SPC with organotin copolymer antifouling.

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).

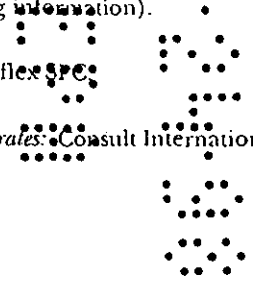
Unpainted surfaces: Prepare surface and apply recommended primer. Apply one or more coats of Intersmooth 360 Ecoloflex SPC as specified. (Consult the relevant primer data sheet for surface preparation and overcoating information.)

Maintenance: Application of Intersmooth 360 Ecoloflex SPC over self: 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 Intersmooth 360 Ecoloflex SPC within the overcoating interval specified for the primer (consult relevant primer data sheet for surface preparation and overcoating information).

Apply the specified number of full coats of Intersmooth 360 Ecoloflex SPC.

Application of Intersmooth 360 Ecoloflex SPC over other antifouling substrates: Consult International.



10/11

NO COPING
with COMBIBITE
to EPA Label Dated:

Intermooth® 360 Ecoloflex SPC

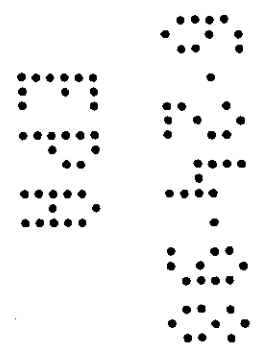
Tin-Free Self Polishing Copolymer Antifouling

SEP 07 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
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2693-187

MIXING	This material is a one component coating. Always mix thoroughly with a power agitator before application.
APPLICATION	Apply by airless spray. Application by other methods, brush or roller, may require more than one coat and is suggested for small areas only. Apply 12.5 mils (318 microns) wet which will yield 5.0 mils (127 microns) dry film thickness. Consult the following equipment recommendations or utilize suitable equal. Equipment <i>Airless Spray:</i> Minimum 28:1 ratio pump; .018"-.026" (457-660 microns) orifice tip; 3/8" (9.5 mm) ID high pressure material hose; 60 mesh tip filter.
THINNING	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	Prior to use, obtain and consult the Material Safety Data Sheet for this product concerning health and safety information. Read and follow all precautionary notices on the Material Safety Data Sheet and 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. Actual safety measures are dependent on application methods and work environment. Medical Advisory Number 1-800-854-6813.
WORLDWIDE AVAILABILITY	Consult International



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Intermooth® 360 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antitooling

REGULATORY DATA

Refer to container label for information concerning Precautionary Statements, Directions for Use and Storage and Disposal.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 07 2000

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

2693-187

UNIT SIZE

*This product can be made available in other pack sizes.
Consult International for details.*

5.3 Gallon Unit (20 l)

UNIT SHIPPING WEIGHT

BEA368: 69.2 lb (31.5 kg)

BEA369: 69.2 lb (31.5 kg)

UN SHIPPING NO: 1263

STORAGE

Store in cool, dry conditions.

Shelf Life

6 months minimum from date of manufacture when maintained
in protected storage at 40-95°F (4-35°C). Subject to reinspection
thereafter.

All representations and statements concerning the product(s) in this data sheet 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.

Intermooth and Ecoloflex are registered trademarks.



COURTAULDS
COATINGS