3/17/2003

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U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Antimicrobials Division (7510C) 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance: 2693-188

MAR 1 7 2003

Term of Issuance: Time Limited; expires

X Registration

NOTICE OF PESTICIDE:

Re-registration

Name of Pesticide Product:

"Intersmooth 365 Ecoloflex SPC

midnight on 6/30/05

Antifouling BEA 363 Dark

Brown"

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP code):

International Paint, Inc. 2270 Morris Avenue Union, NJ 07083

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials 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, as amended.

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

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

- 1. Submit and/or cite all data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for re-registration of your product under FIFRA Section 4.
- 2. Submit, within 30 days from the date of this notice, information which satisfies the two data requirements listed below. This information is required for conducting exposure risk assessments and for assuring appropriate labeling.

875.2700 Product Use Information (new requirement)

875.2800 Description of Human Activity (new requirement)

Prior to submitting this information, it is recommended that you contact the Agency by a prearranged telephone conference so that correct and comprehensive information is submitted. Some examples of product use/human activities information or estimates are listed below (registered products listed below which are not owned by you are shown only as examples of information which may/may not apply to your products):

Signature of Approving Official:

Marshall Swindell, Product Manager, Team 33,

Regulatory Management Branch I,

Antimicrobials Division

MAR 1 7 2003

page 2: EPA Reg. No. 2693-188

Typical and maximum number of gallons expected to be applied by an individual worker;

Which products are intended only for recreational vessels and/or commercial vessels (eg., clarify whether EPA Reg. No'.s 2693-194/-200 and 64684-6 are intended for recreational boats);

Expected vessel size ranges for each product; which application methods apply to which products (eg., EPA Reg. No. 64684-4 does not prohibit spraying, etc.);

Which products get applied only by professionals and/or homeowners (eg., clarify whether EPA Reg. No. 64684-6 is intended to be applied by professionals);

Correct PPE for each product (eg., clarify why EPA Reg. No. 2693-194 requires eyewear and not other PPE; clarify whether the listed PPE is for both hull preparation and/or paint application);

Application rates in gallons/ft²; minimum number of applications/coats; type of spray equipment (eg., psi, etc.); characterization of the residential and commercial activities (eg., commercial ship hull painters typically paint for X hours per day using airless spraying, homeowners with boats less than X feet generally use brushes while X percent of homeowners are believed to use airless sprayers, etc.).

3. By 12/31/03, submit/cite acceptable data or waiver requests to satisfy the following five data requirements.

73-1 Whole sediment acute freshwater invertebrate (existing unsatisfied requirement)

73-2 Whole sediment acute marine invertebrate (existing unsatisfied requirement)

850.5400 Marine diatom Skeletonema costatum (new requirement)

850.4225 Seedling emergence in rice (formerly reserved in prior notice, now required, study submitted 12/30/02 is under review)

850.5400 Vegetative vigor dose response in rice (new requirement)

4. Submit by 1/1/05, data to satisfy the following two requirements. The proposed outdoor exposure study protocol submitted 2/9/03 by Arch Chemicals on your behalf must be found acceptable by EPA prior to initiating these data. The Agency will make every attempt to provide a quick decision/feedback on this protocol.

875.1100 Dermal exposure - outdoor

875.1300 Inhalation exposure - outdoor

page 3: EPA Reg. No. 2693-188

5. 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 72-7 Simulated or actual field testing for aquatic organisms

GLN 71-4 Avian Reproduction

GLN 73-3 Acute Pore Water Studies (fish and invertebrates)

GLN 74-1 Whole Sediment Chronic Study (invertebrates)

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 6/30/05. If you fail to satisfy the conditions imposed in this registration, EPA may issue a Notice of Intent to Cancel under Section 6(e) of FIFRA. Your release for shipment of the product constitutes acceptance of these conditions.

For detailed explanations of outstanding and fulfilled time-limited data requirements, see the EPA letter sent to Arch Chemicals, dated 3/14/03.

A stamped copy of the label stamped "accepted with comments" is enclosed for your records.

If you have any questions concerning this letter, please contact myself at 703-308-6341, or Tony Kish at (703) 308-9443.

Sincerely.

Marshall Swindell

Product Manager 33

Regulatory Management Branch 1 Antimicrobial Division(7510C)

Enclosure

ACCEPTED
with COMMENTS
in EPA Letter Dated:

MAR 17 2003

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

2693-188

Product Identity

Intersmooth 365 Ecoloflex SPC Antifouling

Order Number

BEA363 Dark Brown

FOR COMMERCIAL USE ONLY

Active Ingredients:

CUPROUS OXIDE

42.69%

ZINC 2-PYRIDINETHIOL 1-OXIDE*

3.18%

Inert Ingredients:

54.13%

100.00%

COPPER AS METALLIC = 38.63%

Contains petroleum distillates.

*Zinc Pyrithione

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)

ACCEPTED
with COMMETTED
in ERM better Detect

MAR 1 7 2003

Under the Forestal Insections, Flungicide, and Rodenfolde Act as amended, for the pesticide, registered under EPA Reg. No.

2693-188

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.

m EFM Letter Dated.

MAR 17 2003

Under the Federal Insecucide, Fungicide, and Rodentoide Actic amended, for the pesticide 10 Ussered under EPA Reg. No. 2 6 93-188

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) One pack

Converter 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

ASTM D Self 1640 7.5.1) (ASTM D - 1640 7.8) Minimum drying time* before flooding Touch Minimum Maximum (for 2x5 mil [127 microns] DFT coats) 18 6 1 month

Overcoating Interval By

41°F (5°C) 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:

Drying Time (hours) Substrate Temperature

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.

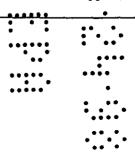
LIMITATIONS: Apply in good weather when air and surface temperatures are above 35°F (2°C). Surface temperature must be at least 5°F (3°C) above dew point. For optimum application properties, bring material to 70-80°F (21-27°C) temperature range prior to mixing and application. Unmixed material (in closed 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 365 Ecoloflex SPC will exhibit a slight color change. Consult International for overcoating Intersmooth 365 Ecoloflex SPC with organistin copoly-

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).



Inpainted surfaces: Prepare surface and apply recommended primer. Apply one or more coats of Intersmooth 365 Ecoloflex 3PC as specified. (Consult the relevant primer data sheet for surface preparation and overcoating information.)

Maintenance: Application of Intersmooth 365 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 sys-

Repair corroded areas with the recommended anticorrosive primer and apply a spot coat of Intersmooth 365 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 365 Ecoloflex SPC.

Application of Intersmooth 365 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

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

Thursing: 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: 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 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

HIPPING NÓ: 1263 AGE:

Shelf Life

Sure in cool, dry conditions.

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 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.

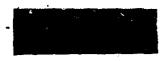


Courtaulds Coatings, Inc. 2270 Morris Ave, Union, NJ 07083 Union, NJ • Houston, TX • Louisville, KY

ACCEPTED with COMMENTS in EPA Letter Dated: MAR 1 7 2003

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

2693-188



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Intersmooth® 365 Ecoloflex SPC

Marine Coatings

ACCEPTED with COMMENTS in EPA Letter Dated:

Tin-Free Scif Polishing Copolymer Antifouling

MAR 17 2003

INTENDED USES

At Newbuilding.

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

2693-188

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

BEA363 Dark Brown, BEA364 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) (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

Induction/Sweat-in Time

Not applicable

Thinner

Not recommended. If necessary use GTA007, see thinning section.

Cleaner

GTA007

Pot Life

Not applicable

Drying Time (hours) Substrate Temperature	(ASTM1) 1640 7.5.1) Touch	Overcoatii Self (ASTM D-164 Minimum	ng Interval By 0 7.8) Maximum	Minimum drying time* before flooding (for 2x5 mil {127 microns} DFT coats)
41°F (5°C)	1	6	6 months	18
73°F (23°C)	40 mins	4	6 months	12
95°F (35°C)	30 mins	3	6 months	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.

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REGULATORY DATA

VOC

BEA363 4.23 lb/gal (508 g/l) as supplied

BEA364 4.23 lb/gal (508 g/l) as supplied

EPA

This product is not registered in the USA or Canada. See Page 4 for additional regulatory data.

Intersmooth® 365 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antibouling

MAR 1 7 2003

Under the Federal Insect cide, Fungicide, and Redenticide Act camended, for the pesticide, registered under EMR Reg. No. 2693-788

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 4 months on vertical sides; up to 6 months on flat bottom. Tropical conditions: up to 3 months on vertical sides; up to 6 months on flat bottom.

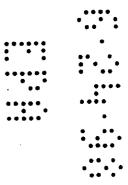
If these periods are exceeded the antifouling performance may be impaired. On immersion, Intersmooth 365 Ecoloflex SPC will exhibit a slight color change. Consult International for overcoating Intersmooth 365 Ecoloflex SPC with organotin copolymer antifoulings.

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 365 Ecoloflex SPC as specified. (Consult the relevant primer data sheet for surface preparation and overcoating information.)



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Intersmooth® 365 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antifouling

MAR 1 7 2003

Under the Federal Insecticide.
Pungloide, and Rodendbide Act as amended, for the pesticide.
redistored under EPA Reg. No.

MINING

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) 1D 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 clapsed time including work stoppages. Monitor material condition.

WELDING

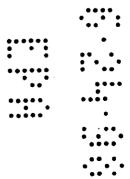
In the event welding or flame cutting is performed on metal coated with this product, do so in accordance with instruction in ANSI/ASC Z49.1 "Safety in Welding and Cutting."

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



Intersmooth® 365 Ecoloflex SPC

Tin-Free Self Polishing Copolymer Antifouling

REQUIATORY DATA

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

> ACCEPTED with COMMENTS in EPA Letter Dated:

MAR 1 7 2003

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

2693-188

UNIT SIZE

STORAGE

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

5.3 Gallon Unit (201)

UNIT SHIPPING WEIGHT

BEA363: 71.5 lb (32.5 kg) BEA364: 71.5 lb (32.5 kg)

UN SHIPPING No: 1263

Shelf Life

Store in cool, dry conditions.

6 months minimum from date of 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 when unternents nereinfelie not intended to be specific recommendations or warranties of any product, combination of products or fitness for any particular purpose. Any warranty, if given a 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 corrfully.

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