

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 15 2003

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

**Subject: Intersmooth 365 Ecoloflex SPC Antifouling
EPA Reg. No. 2693-188: Amendment Dated 9/19/03**

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to provide a revised label so that it is in harmony with the label for the substantially similar product EPA Reg. No. 2693-187 by revising the "Signal Word" from "Warning" to "Danger", deleting "tin free", qualifying the 6 month shelf life, paginating and listing a label revision date, and making other changes, is acceptable with the following requirements:

1. As per the revised Registration Notice issued for this product dated 3/17/03, registration for this product (including all accepted amendments) will expire on 6/30/05. Failure to satisfy the conditions imposed in the Registration Notice, may result in the EPA issuing a Notice of Intent to Cancel under Section 6(e) of FIFRA. Your release for shipment of the product constitutes acceptance of these conditions.
2. Submit within 60 days of this letter, three copies of a final production label which makes the following changes.

On page 4 and 6, delete "Special boosting" from "Special boosting biocide package". This change has been blacked-out on the stamped copy. The "Special boosting" claim is not acceptable because it is considered to imply heightened efficacy compared with other similar products (see the EPA "Label Review Manual", 3rd edition page 12-5).

A copy of the label stamped "Accepted With Comments" is attached for your records.

If you have any questions about the comments in this letter, please feel free to contact Tony Kish at 703-308-9443, or myself at 703-308-6341.

Sincerely,
Tony Kish for
Marshall Swindell,
Product Manager Team 33,
Regulatory Management Branch I
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL	SURNAME	DATE						

Product Identity

Intersmooth® 365 Ecoloflex
SPC Antifouling

1

Order Number

BEA363 Dark Brown

For Commercial Use Only

Active Ingredients:

Cuprous Oxide	42.69%
Zinc 2-Pyridinethiol 1-Oxide*	3.18%

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 in EPA Letter Dated

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Inert Ingredients:

	<u>54.13%</u>
	100.00%

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended, for the pesticide,
 registered under EPA Reg. No.
 2693-188

COPPER AS METALLIC = 38.63%

Contains petroleum distillates.

* Zinc Pyrithione

KEEP OUT OF REACH OF CHILDREN

DANGER

- See side panel for additional Precautionary Statement-

EPA Reg. No.: 2693-188

EPA Est. No.: 2693-NJ-1

For specific state registrations contact your International Representative.

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

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

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

2

Corrosive. Causes irreversible eye damage or skin burns. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear protective clothing such as goggles, rubber 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.

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.

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Under the Federal Insecticide,
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265.3-188

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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6/10

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2693-188

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.)

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 system.

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

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 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 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

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

*Note: Active ingredients remain stable, but application properties may be affected.

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.

Ecoloflex is a trademark of Nippon Paint Company Ltd

RFV 9/03

Intermooth® 365 Ecoloflex SPC

Self Polishing Copolymer Antifouling

INTENDED USES At Newbuilding.

PRODUCT DESCRIPTION A high performance self polishing copolymer antifouling for coastal vessels.

- Copper acrylate patented polishing technology
- 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) (Setflash) (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

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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	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 different dry film thicknesses and to Limitations section for maximum recommended atmospheric exposure time before flooding.

REGULATORY DATA

VOC	BEA363 4.23 lb/gal (508 g/l) as supplied BEA364 4.23 lb/gal (508 g/l) as supplied
EPA	EPA Reg. No. 2693-188 See Page 4 for additional regulatory data.

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

2693-188

Intersmooth® 365 Ecoloflex SPC

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 (+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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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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Intersmooth® 365 Ecoloflex SPC

Self Polishing Copolymer Antifouling

REGULATORY DATA

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

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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

BEA363: 71.5 lb (32.5 kg)

BEA364: 71.5 lb (32.5 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.

*Note: Active ingredients remain stable, but application properties may be affected.

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