

2693-197

09/26/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 26 2002

**International Paint Inc.**

2270 Morris Avenue  
Union, NJ 07083

Attention: Mr. John P. Pazdera

Subject: **VC17m with Biolux Original**  
EPA Registration No. 2693-197  
Amendment Application Dated: August 9, 2002  
EPA Received Date: August 13, 2002

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable, 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 require all Registrants of similar products to submit such data.
2. The following studies have been submitted by your supplier pending the completion of an Environmental Risk Assessment on this Conditional Registration. Additional data may be required based upon the results of the Risk Assessment.

**Studies on the Irgarol Technical Grade Active**

- GLN 72-4 Fish Early Life Stage (Estuarine Fish Study)
- GLN 72-4 Aquatic Invertebrate Life Cycle (Freshwater Invertebrate)
- GLN 73-1 Whole Sediment Acute, Freshwater Invertebrates
- GLN 73-2 Whole Sediment Acute, Marine Invertebrates

**CONCURRENCES**

|         |  |  |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|--|--|
| SYMBOL  |  |  |  |  |  |  |  |  |
| SURNAME |  |  |  |  |  |  |  |  |
| DATE    |  |  |  |  |  |  |  |  |

**Data on Each of the Three Major Degradates\* of Irgarol**

(\*GS-26575, CA-30-0155, and GS-28620)

GLN 72-1 Acute Freshwater Fish LC50 (one specie), or  
 GLN 72-3(a) Acute LC50 Estuarine and Marine Fish, and  
 GLN 72-2 Acute Freshwater Invertebrate LC50 (Daphnia), or  
 GLN 72-3(c) Acute LC50 Estuarine and Marine Invertebrate, and  
 GLN 123-2 Aquatic Plant Growth (2 species: Navicula pelliculosa, and Skeletonema costatum)

3. Submit the following "reserved" studies within 18 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 164-2 Aquatic Field Study  
 GLN 165-5 Accumulation Studies (nontarget organism)  
 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  
 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.

4. The waiver request for the acute inhalation study has been denied. You must submit the acute inhalation study withing six (6) months from the date of registration.

5. This conditional registration will expire automatically on August 30, 2003. If you fail to satisfy the conditions imposed in the registration, EPA may issue a Notice To Cancel under Section 6(e) of FIFRA.

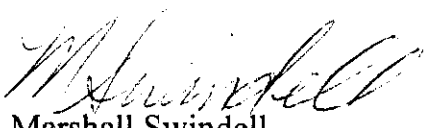
Submit two copies of the revised final printed label for the record.

You should be aware that the Agency has not completed its environmental risk assessment to support the use of Irgarol as an antifoulant. Note also that the Agency is aware that Sweden, Denmark, and England have restrictions on the use of Irgarol antifoulant paints. Canada has also expressed concern. The concerns outlined in environmental assessments from those countries will be taken into consideration as we work toward completing our own risk assessment. Once the Agency has completed its environmental risk assessment, we may ask for additional data such as a monitoring study or we may ask for some label modifications/restrictions. We will notify you when our environmental risk assessment is completed.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely,



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

Enclosure

# VC 17m with Biolux Original

Part A (Base) of a Two Part Antifouling Paint System

Teflon – Only by DuPont  
Biolux Blocks Slime  
Low Friction, Thin Film Antifouling  
Biolux Boosts Performance by Controlling Slime

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**Copper Powder Bag (Part B) Inside Cap (Copper Powder = 84.00%)  
Mix Powder and Liquid Before Use  
Mix Only with Part B - Copper Powder V900 (EPA Reg. No. 2693-196)**

**ACTIVE INGREDIENT:**

N-Cyclopropyl-N'-(1,1-Dimethyl-ethyl) = 2.38%  
-6-(Methylthio-1,3,5-triazine-2,4-Diamine)

**INERT INGREDIENTS:**

= 97.62%  
**TOTAL** = 100.00%

**EPA Registration No. 2693-197**

**EPA Establishment No. 2693-NJ-1**

See side panel for additional precautionary statements

**Net Contents: 0.75 U.S. QUART (0.710 LITERS)**

**DISCLAIMER:** The performance of any marine coating depends on many factors outside the control of International Paint Inc. including the surface preparation, proper application and the environmental conditions. Therefore, International Paint Inc. cannot guarantee the suitability of this product for your particular purpose or application. **IMPLIED WARRANTIES OF FITNESS OF A PARTICULAR PURPOSE AND MERCHANTABILITY ARE EXCLUDED. INTERNATIONAL PAINT INC. SHALL NOT UNDER ANY CIRCUMSTANCES BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES.** By purchase or use, of the product, buyer agrees that the sold and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the product as International Paint Inc.'s option.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

International Paint Inc.  
2270 Morris Avenue  
Union, NJ 07083

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Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
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2693-197

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER**

Corrosive. Causes irreversible eye damage or skin burns. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Wear goggles, face shield, or a respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute of Occupational Safety and Health. Wear protective clothing and rubber gloves. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

**FIRST AID**

(Applies to both products below individually)

- VC17m with Biolux – Original (EPA Reg. No. 2693-197)
- VC17m with Biolux – Copper Powder V900 (EPA Reg. No. 2693-196)

**IF SWALLOWED:** Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

**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 eyes. Call a Poison Control Center or doctor for treatment advice.

**IF ON SKIN AND 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, give artificial respiration preferably mouth-to-mouth if possible. Call a Poison Control Center or doctor for further treatment advice.

In case of emergency call 1-800-854-6813. Have the product container or label with you when calling a Poison Control Center or doctor or going in for treatment.

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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 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 HAZARDS:**

**Flammable.** Keep away from heat and open flame.

**STORAGE AND DISPOSAL:**

Do not contaminate water, food, or feed by storage and disposal. Open dumping is prohibited.

**Pesticide Disposal:** Pesticide 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 procedure.

For Chemical Emergency, Spill, Leak, Exposure or Accident, Call Toll Free – Day or Night: Chemtrec 1-800-424-9300. Medical Advisory: Contact your Local Poison Control Center or call 1-800-854-6813.

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## VC<sup>®</sup>17m with Biolux

### Product Description

VC<sup>®</sup>17m with Biolux is a friction reducing, low drag, high performance antifouling paint formulated with "Teflon". When applied the VC 17M with Biolux will immediately give a thin, super smooth, racing finish, that would normally take days of tiresome sanding. VC 17m with Biolux incorporates the Biolux<sup>™</sup> technology along with the metallic copper to achieve complete protection against zebra mussels, teredo worms, weed, algae and slime fouling. This is especially helpful in freshwater or low fouling saltwater. The applied thickness of VC 17m with Biolux is eight times thinner than traditional paint which virtually eliminates film build-up.

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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.

### Preparation

**BARE FIBERGLASS (POLYESTER OR VINYLESTER):** - Scrub the surface thoroughly with soap and water using a stiff brush. Flush well with fresh water. Use INTERLUX<sup>®</sup> Fiberglass Solvent Wash 202 to remove any wax or other contaminants from the surface.

- **SANDING SYSTEM:** Matte sand with 320-grit sandpaper. Wipe again with Fiberglass Solvent Wash 202.

- **NON-SANDING SYSTEM:** Clean as above. Apply one coat of No-Sand Primer and follow the overcoating times.

**BARE WOOD:** Sand smooth with 80-100-grit sandpaper, and wipe with INTERLUX<sup>®</sup> SPECIAL THINNER 216.

**UNDERWATER METALS:** Underwater metals must be primed to avoid contact with copper bottom paints. DO NOT USE ON ALUMINUM. Grind or sandblast to bright metal, clean thoroughly with SPECIAL THINNER 216 and overcoat within one hour with VC TAR. Apply 3-5 additional coats of VC TAR taking care to follow the label directions. If you cannot apply VC TAR within one hour of blasting, apply one thin coat of INTERLUX<sup>®</sup> VINY-LUX<sup>®</sup> PRIMEWASH 353/354 prior to application of VC TAR.

### PREVIOUSLY PAINTED: GOOD CONDITION

- **WITH VC 17m:** Clean with fresh water. Sand any loose or flaking paint with 320 grit sandpaper and wipe off sanding residue with VC17m THINNER V172.

- **HARD ANTIFOULING:** Due to the porosity of hard antifouling paints, it needs to be sanded several times to reach an acceptable surface for application of VC 17m with Biolux.

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Begin sanding with 80 grit sandpaper and work through the sandpaper grades until a final sanding with 320 grit sandpaper is reached. Wipe the surface with **SPECIAL THINNER 216** to remove sanding residue.

- **SOFT ANTIFOULING**: Soft antifouling paints should be removed prior to application of **VC 17m with Biolux**.

**PREVIOUSLY PAINTED: POOR CONDITION** - Remove all antifouling paint and proceed with system for bare surface.

### Application

**MIXING**: **VC 17m with Biolux** is a two-part product that must be mixed prior to use. Mix **VC 17m with Biolux Part A** base with **Part B copper V900** (found in bag under the cap). Mix thoroughly. Stir occasionally during application.

**APPLICATION**: **VC 17m with Biolux** is applied with a short nap roller or solvent resistant foam roller, 4-6" wide or an electric airless spray gun.

**Low fouling, cold saltwater**: Three coats the first season and two coats each season to follow.

**Freshwater**: Two coats the first season and one coat each season after

**COLOR**: **VC 17m with Biolux** changes color after several weeks of immersion.

**V405 (Original)**: At application - copper bonze. Changes to brownish gray.

**V406 (Blue)**: At application - dark copper bronze. Changes to dark blue.

### Hints

1. When rolling, pour only small amounts into a steel roller tray
2. Roll quickly and in one direction only
3. When spraying make sure that the nozzle is not more than 6-8 inches from the hull.
4. Do not use conventional spray equipment as this may result in dry spray
5. Use **VC17m Thinner V172** if needed, 10% by volume maximum
6. **VC 17m with Biolux** covers 85 sq. ft./ quart

### Dry Time Table

| Temperature |    | Touch<br>Dry | Overcoating Time |         | Launch Time |         |
|-------------|----|--------------|------------------|---------|-------------|---------|
| F°          | C° |              | Minimum          | Maximum | Minimum     | Maximum |
| 41          | 5  | 5 min        | 10 min           | N/A     | 20 min      | N/A     |
| 59          | 15 | 5 min        | 10 min           | N/A     | 20 min      | N/A     |
| 73          | 23 | 3 min        | 10 min           | N/A     | 15 min      | N/A     |
| 95          | 35 | 2 min        | 10 min           | N/A     | 10 min      | N/A     |