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

MAY - 3 2011



# EPA United States Office of Pesticide Programs Agency Office of Pesticide Programs

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

Attention: John P. Pazdera

Pesticide Registration Manager

Subject: Super Epoxycop with Irgarol - Blue

EPA Registration No. 2693-212 Amendment Dated March 3, 2011

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

# **Proposed Amendment**

- Minor changes to the Subset B: Alternate Directions for use for Pleasure Craft

#### **General Comments**

A stamped copy of the "accepted" draft 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 Antimicrobials Division (7510P)

Enclosure

# SUPER EPOXYCOP with IRGAROL - Blue

- High Copper Antifouling for Ultimate Protection

- with Irgarol

- Irgarol Blocks Slime

- Biolux Boosts Antifouling Performance by Controlling Slime

- Antifouling Protection for All Conditions

Multi-Season, Self-Polishing, No Paint Buildup

Use on fiberglass, wood and steel hulls

Irgarol controls slime

- Hard, Long Lasting Formula for Fiberglass, Wood and Steel

Under the Federal Insecticide,
Flugicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No.
2093-212

ACCEPTED

with COMMENTS

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## KEEP OUT OF REACH OF CHILDREN

#### **CAUTION**

See side panel for additional precautionary statements

NET CONTENTS: ONE U.S. GALLON (3.785 LITERS)

EPA Registration No. 2693-212 EPA Establishment No. 2693-NJ-1

# Active Ingredients:

Cuprous Oxide N-Cyclopropyl-N'-(1,1-dimethylethyl)-6-	= 55.00% = 0.98%	· ( t
(methylthio)-1,3,5-triazine-2,4-diamine Inert Ingredients:	= 44.02%	
Copper as Metallic	= 48.80%	· · · · · · · · · · · · · · · · · · ·

Contains Petroleum Distillate

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 FOR A PARTICULAR PURPOSE AND MERCHANTIBILITY 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 sole and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the product at International Paint Inc.'s option.

International Paint LLC 2270 Morris Avenue Union, NJ 07083

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# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMAL Lader the Federal Insecticide, Fungicide, and Rodenticide Act as

#### CAUTION

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

Harmful if absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective clothing such as gloves, long-sleeved cotton shirt, long pants, and hat. Avoid breathing spray mist. While spraying paint or sanding or sand blasting boat surfaces, wear a mask or a respirator jointly approved by the Mining Safety & Health Administration and the National Institute of Occupational Safety & Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. May pose an aspiration pneumonia hazard.

#### FIRST AID

IF SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so 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.

#### **ENVIRONMENTAL HAZARD**

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.

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## PHYSICAL OR CHEMICAL HAZARD

Combustible. Do not use or store near heat or open flame.

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EPA Letter Dated:

#### STORAGE AND DISPOSAL

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Do not contaminate water, food or feed by storage or disposal. Open dumping the pesticide, prohibited.

registered under EPA Reg. I

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as

PERMENUM TRE pesticide,
registered under EPA Reg. No. 2 693-216

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank, and drain for 10 seconds after the flow begins to drip. Fill the container ½ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

# [Subset A – Directions for Use for Pleasure Craft]

PRODUCT DESCRIPTION: This product is a premium ablative antifouling coating that provides effective multi-season protection for boats that are used in high fouling salt or fresh water areas on boat bottoms only. The combination of cuprous oxide and Irgarol, an anti-slime additive, provides excellent antifouling protection for boats in all waters. The combination of two biocides, cuprous oxide and Irgarol, an anti-slime additive, provides multi-season antifouling protection against barnacles, zebra mussels, hydroids, algae and slime for boats in salt or fresh water on boat bottoms only. It releases these biocides by the constant exposure of new paint film to the water. It is compatible over most all types of properly prepared bottom paints. Do not use on aluminum hulls.

**DIRECTIONS FOR USE:** It is a violation of federal law to use this product in a manner inconsistent with it's labeling.

**SURFACE PREPARATION:** Surface must always be clean, dry and properly prepared prior to painting. Failure to do so will lead to eventually blistering and/or peeling. All sanded surfaces must be wiped clean with [West Marine Model 329591 Reducer/Thinner; Interlux Fiberglass Solvent Wash 202] to remove sanding residue.

**GENERAL APPLICATION:** For use on boats below the true waterline. Can be brushed or rolled on fiberglass, wood, steel and previously painted surfaces per application systems below. <u>DO NOT USE ON ALUMINUM</u>. Apply at least three (3) coats for best performance, as the life of the paint is proportional to the number of coats applied.

**MIXING AND THINNING:** Shake or mix thoroughly and stir continuously while using. Thin when necessary with [West Marine Model 329591 Reducer/Thinner; Interlux Special Thinner 216; Brush-Ease 433].

**THEORETICAL COVERAGE:** Depending on surface and conditions, one gallon of bottom paint will usually cover over 350 square feet of surface when brushed or rolled. **CLEAN UP:** Use [West Marine Model 329591 Reducer/Thinner; Interlux Special Thinner 216] for cleaning equipment and paint brushes.

**ESTIMATED DRY TIMES:** Bottom paints are designed for overcoating after an overnight dry. Prior to launching, allow a minimum dry of overnight and maximum of 60 days. If drying conditions are poor, or if paint was applied too thickly, longer periods of drying will-be-required. Fresh-coats-of-paint-must-be-thoroughly-dry-before-overcoating. **YEARLY REPAINTING:** Scrub bottom clean at haul-out. Repaint only if old paint is sound and tight; if not, remove it by sanding or with paint remover. If old paint is rough, sand it with 100-150-grit sandpaper. Prepare seams, nicks and chips as below. Spot coat any scuffs with antifoulant. Apply three (3) coats of antifoulant.

ON BARE WOOD: Sand bare wood with 80-grit sandpaper. Repair imperfections with an epoxy filler and fairing compound. Apply first coat of bottom paint reduced 10% with [West Marine Model 329591 Reducer/Thinner; Interlux Special Thinner 216; Brush-Ease 433] to penetrate the porous grain. Fair seams with underwater seam compound. Apply second and third coats of antifoulant.

**ON BARE FIBERGLASS:** Dewax by washing with [West Marine Model 329591 Reducer/Thinner; Interlux Special Thinner 216; Brush-Ease 433]; remove dissolved wax at once with clean paper towels or rags: repeat. Sand thoroughly to a dull flat finish with 80-grit sandpaper. Fill any chips or dings with an epoxy filler and fairing compound, allow to dry and sand. Apply 2 to 3 coats of antifouling paint.

ON BARE STEEL: Sandblast surface to a near white metal: remove blast residue with a broom and air hose. Wipe off with [West Marine Model 329591 Reducer/Thinner; Interlux Special Thinner 216; Brush-Ease 433]. Do not sand. Fill in any imperfections with fairing compound. Sand smooth and wipe clean. Apply 3 coats of high quality marine primer, followed by three (3) coats of antifoulant.

**DISCLAIMER:** The performance of any marine paint or coating depends on many factors outside the control of our company including surface preparation, proper application, and environmental condition. Therefore, we cannot guarantee this product's suitability for your particular purpose or application. Implied warranties or fitness for a particular purpose and of merchantability are excluded. We shall not, under any circumstances, be liable for incidental or consequential damages. By purchase or use of this product, buyer agrees that the sole and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the product, at the company's option.

ACCEPTED with COMMENTS EPA Letter Dated:

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Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 2693-212 PRODUCT DESCRIPTION: This product is a hard, durable, high performance antifouling paint for use in high fouling areas. This product provides excellent long-term protection from shell and weed fouling and uses Biolux® technology to block slime. The fast dry formula of this product allows the boat to be painted and launched in the same day. This product can be used in fresh, salt and brackish-water-on-fiberglass, wood and properly primed metal boat hulls and parts. This product can be applied by brush, roller or spray. This product has excellent color stability and resists changing color at the waterline.

## **DIRECTIONS FOR USE:**

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

**COMPATIBILITY:** This product can be applied over any other hard antifouling paint after sanding the surface. Soft antifouling paints will need to be removed or overcoated with Primocon® before applying this product.

V.O.C.: Less than 330 grams/liter 2.75 lbs./gallon

THEORETICAL COVERAGE: 455 sq ft./gal yields 2 mils dry film thickness

**THINNER:** Special Thinner 216

or Brush-Ease 433

**DRY TIMES:** Touch Dry – 1 hour minimum 77°F (25°C) Dry to Overcoat – 2 hours minimum Dry to Launch – 8 Hours minimum 60 days maximum

**THINNING:** Thin only when necessary Do not exceed 10%

**APPLICATION TEMPERATURES:** 50°F (10°C)\* and above (air and hull)

\*If the air temperature falls below 50F (10C) during the dry time, extend the dry times to 12 hours minimum.

# **APPLICATION SYSTEMS**

PREVIOUSLY PAINTED - GOOD CONDITION: Remove all traces of Reservation and contamination by sanding the entire surface with 80-grit sandpaper; O OPENIENTS EPA Letter Dated: surface clean. Apply at least 2 coats of this product.

PREVIOUSLY PAINTED - POOR CONDITION: Completely remove all old AY antifouling paint, using Interstrip® 299E. Sand and wipe clean with Fiberglass Insecticide, Under the Federal anticide Age Fungicide, and Rodenticide Act as Solvent Wash 202. amended, for the pesticide, registered under EPA Reg. No. 2693-212

# **BARE FIBERGLASS:**

It is very important that bare fiberglass be properly prepared to prevent delamination of the antifouling paint. Remove mold release wax using one of the following Interlux products. Fiberglass Surface Prep YMA601, Low VOC Fiberglass Solvent Wash 202V or Fiberglass Solvent Wash 202 following the product label instructions. To be certain that all of the contamination has been removed, run water over the surface. If the water beads up or separates, clean again. When the water sheets off, all contamination has been removed. After the surface has been properly cleaned, proceed with one of the application systems below.

BARE FIBERGLASS IO SAND SYSTEM: Clean the surf of following the preparation procedure above. Apply one coat of Interlux InterProtect® 2000, or Fiberglass No-Sand Primer YPA200 following the label instructions for applying the primer and overcoating with antifouling paint. Apply two coats of this product, allowing for the appropriate dry times.

BARE FIBERGLASS - SANDING SYSTEM: Clean the surface following the preparation procedure above. Sand the entire surface with 80-grit sandpaper and wipe clean with Fiberglass Solvent Wash 202 to remove sanding residue. Repair any surface imperfections with Watertite YAV135. Sand and wipe clean. Apply two coats of this product allowing for appropriate dry times.

BARE WOOD: Sand the entire surface with 80-grit sandpaper, remove sanding residue. Repair imperfections with Watertite YAV135. Sand and wipe clean. Apply the first coat of this product thinned 10% with Special Thinner 216 or Brush-Ease 433. Fill seams with Seam Compound 30 (if necessary). Apply two more coats of this product unthinned, allowing appropriate dry times.

**UNDERWATER METALS:** Contact the Interlux Technical Service Department at 1-800-468-7589 for full information on how to properly prime underwater metals. DO NOT USE ON ALUMINUM.

Temperature		Touch Dry	Overcoating Time	Immersion Time	
°F	°C	Minimum	Minimum	Minimum	Maximum
50	10	2 Hours	6 Hours	12 Hours	60 Days
73	23	1 Hour	2 Hours	8 Hours	60 Days
95	35	1 Hour	1 Hour	6 Hours	60 Days

Color difference may occur between actual paint and color swatch on front of cap.

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