

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

NOTICE OF PESTICIDE:

X Registration
Reregistration

(under FIFRA, as amended)

EPA Reg. Number:

Date of Issuance:

SEP 1 5 2004

2693-213

Term of Issuance: Expiration

Date 06/15/05

Name of Pesticide Product:

Super LK Plux with Irgarol - BLUE

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 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 of your product under FIFRA sec. 3(c) (5) when the Agency request all registrants of similar product to submit such data; and submit acceptable response required for reregistration of your product under FIFRA section 4.

The Agency is currently reviewing additional information submitted by your supplier. Therefore, we are extending this limited registration to June 15, 2005.

Signature of Approving Official:

Marshall Swindell, Product Manager 33

Regulatory Management Branch I Antimicrobials Division (7510C) Date:

SEP 1 5 2004

2. This conditional registration will expire automatically on June 3, 2005. If you fail to satisfy the conditions imposed in the registration, EPA may issue a Notice To Cancel under Section 6(e) of FIFRA.

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 label is enclosed for your records.

Sincerely yours,

Marshall Swindell Product Manager 33

Regulatory Management Branch I Antimicrobials Division (7510C)

Enclosure

SUPER KL PLUS with IRGAROL - Blue

- Antifouling Bottom Paint
- Long Lasting
- Hard Finish
- Contains Organic Boosting Biocide to Combat Slime
- Contains a Specially Formulated Boosting Algaecide to Combat Slime
- Use on wood, fiberglass and steel hulls
- Premium Protection without the Premium Price

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panel for additional precautionary statements

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

	,	•••••
EPA Registration No. 2693-	*****	
EPA Establishment No. 2693-NJ-1	: ::	•••••
Active Ingredients:	••••	•
Cuprous Oxide	= 66.00%	.****.
N-Cyclopropyl-N'-(1,1-dimethylethyl)-6- (methylthio)-1,3,5-triazine-2,4-diamine	= 0.98%	
Inert Ingredients:	= 33.02%	
	100.00%	
Copper as Metallic	= 58.56%	

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.

ACCEPTED with COMMENTS

International Paint Inc. 2270 Morris Avenue Union, NJ 07083

SEP 1 5 2004

in EPA Letter Dated:

Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide, regimered under EPA Reg. No. 2693-263

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 1 5 2004

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

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

Causes eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or 2693-213 clothing. Wear protective clothing such as gloves, long-sleeved cotton shirt, long pants and hat. May be fatal if swallowed or inhaled. Do not breathe vapor or spray mist. While spraying paint or sanding or sandblasting boat surfaces 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. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

FIRST AID

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 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.

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. Open dumping is prohibited.

PESTICIDE DISPOSAL: 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). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

ACCEPTED with COMMENTS in EPA Letter Dated:

SEP 1 5 2004

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

2693-213

[Subset A – For Pleasure Craft]

PRODUCT DESCRIPTION

Super KL Plus with Irgarol® is a premium antifouling coating that provides effective protection for boats that are used in high fouling salt or fresh water areas, or which remain in the water for prolonged periods between haul outs. The high load of cuprous oxide and a specially formulated boosting algaecide provides excellent resistance to barnacles, slime, algae and hydroids. It forms a smooth surface and can be applied over most hard and soft bottom paints.

DIRECTIONS FOR USE

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

New Fiberglass – No sanding: Thoroughly clean with West Marine Model 329591 Thinner/Dewaxer, lifting the solvent, wax and contaminants off the surface with clean rags. Apply one thin coat of West Marine No Sand Primer, allowing the proper dry time and apply two coats of Super KL Plus with Irgarol by brush, roller or spray.

New Fiberglass – Epoxy Barrier Coat: Thoroughly clean with West Marine Model 329591 Thinner/Dewaxer, lifting the solvent, wax and contaminants off the surface with clean rags. Abrade with 80-grit sandpaper, then seal with two coats of West Marine Model 438856 BottomPoxy. Sand between coats and before applying the antifouling coating to improve adhesion. Apply two coats of Super KL Plus with Irgarol by brush, roller or spray.

New Wood: Sand with 80-grit sandpaper, clean thoroughly and apply two coats of Super KL Plus with Irgarol by brush, roller or spray.

Metal: Super KL Plus with Irgarol contains Cuprous Oxide and is not recommended for aluminum surfaces. Iron and steel should be cleaned to bright metal and then sealed with two coats of an anticorrosive primer such as West Marine Model 438856 BottomPoxy. Apply two coats of Super KL Plus with Irgarol by brush, roller or spray.

Previously Coated Surfaces: Super KL Plus with Irgarol can be applied over most other hard and soft bottom paints so long as they are clean and in good condition. Coatings that are cracked, damaged or peeling should be completely removed before painting.

APPLICATION INFORMATION

Mix thoroughly. Allow to dry at least overnight between coats and before launching. For best results apply at least two coats. Apply by spray, short-nap roller or brush. Use mineral spirits for thinning and cleaning equipment. Recommended application temperature range is 65°F - 80°F. Expected coverage is 350-400 square feet per gallon.

MAINTENANCE

Physical damage, fuel spills and pollution can reduce the effectiveness of antifouling coatings. Therefore, it is recommended that the bottom be inspected periodically. If necessary, clean Super KL Plus with Irgarol with a soft towel. Never use a stiff brush, scrub pad or abrasives.

ACCEPTED with COMMENTS in EPA Letter Dated:

SEP 1 5 2004

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

[Subset B – Alternate Directions For Use For Pleasure Craft]

PRODUCT DESCRIPTION: The all-purpose antifouling bottom paint ideally suited for cruising sailboats and powerboats that desire very good, dependable protection. This product is resistant to algae, barnacles and other marine fouling. This product also uses a specially formulated organic boosting biocide to block slime growth. It has universal application over all types of properly prepared bottom paints and surfaces (except aluminum).

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 by brush, roller or spray over other antifouling paints provided these coatings are in good condition, well adhered to the hull and any loose or flaking paint has been removed. Soft antifouling must be sanded heavily or removed. Shake or mix well. Stir while using.

V.O.C.: 324 grams per liter	THINNER: Brushing - Interlux® Brush-Ease 433
	Spraying - Interlux® Special Thinner 216
THEORETICAL COVERAGE: 350 square feet	THINNING: Thin only when necessary.
per gallon per coat	Do not exceed 10% by volume (15% on bare wood).
DRYING TIMES: Touch Dry - 2 hours	CLEAN-UP: Special Thinner 216 or Brush-Ease 433
At 77°F (25°C) Dry to Overcoat - 16 hours minimum*	
Dry to Launch - 16 hours minimum*	· ·
48 hours maximun*	

APPLICATION TEMPERATURES: 50°F (10°C) and above* (Air and Hull)

*If either the air or hull temperature falls below 50°F (10°C) during the 16-hour dry time, extendthe dry time and launch time to 36 hours minimum.

APPLICATION SYSTEMS

PREVIOUSLY PAINTED SURFACES – Good Condition: Remove all traces of loose paint and contamination by sanding the entire surface well with 80-grit sandpaper; wipe the surface clean with Special Thinner 216. Apply two (2) coats of this product allowing the appropriate dry times.

Poor Condition: Completely remove all old paint with Interlux® Interstrip® 299E for fiberglass, and wood and by sandblasting steel surfaces to a near white metal. Proceed with application system for bare work as described below.

BARE FIBERGLASS -No Sand System: Wash entire surface thoroughly with Interlux® Fiberglass Solvent Wash 202, changing rags frequently. Wipe clean with a dry cloth before liquid dries. (Be sure all wax and other contaminants are removed). Repair imperfections with Watertite® Epoxy Filler. Sand and wipe clean. Apply one coat of Interlux® Fiberglass Primer. Allow proper dry time and apply 2 coats of this product allowing the appropriate dry times. Sanding System: Wash entire surface thoroughly with Fiberglass Solvent Wash 202, changing rags frequently. Wipe surface clean with a dry cloth before liquid dries. (Be sure all wax and other contaminants are removed.) Sand entire gel coat well with 80-grit sandpaper until a flat, matte finish is obtained. Wipe surface clean. Repair imperfections with Watertite® Epoxy Filler. Sand and wipe clean. Apply 2 coats of this product allowing the appropriate dry times. BARE WOOD: Sand entire surface thoroughly with 80-grit sandpaper; wipe surface clean. Repair imperfections with Watertite® Epoxy Filler; sand and wipe clean. Apply first coat of this product reduced 15% with Special Thinner 216 to penetrate the porous grain. Fair seams with Interlux® Seam Compound 30. Apply 2 more coats of this product unreduced allowing the appropriate dry times between coats.

hose. Immediately apply one very thin coat of Interlux® Viny-Lux® Primewash 353/354; all of COMMENTS to dry minimum of one (1) hour to a maximum of twenty-four. Do not sand. Fill in all imperfections with Watertite® Epoxy Filler; sand smooth and wipe clean. Apply 3 coats of SEP 1 5 2004 Interlux® Primocon. Allow a minimum of 8 hours between coats and before applying antifouling paint. Apply 2 coats of this product allowing the appropriate dry times.

Pungicide, and Rodenticide Act a: amended, for the pesticide,

Document for Analysis:

The Document is Ineffective because it presents so many barriers to communication:

The Memo:

- 1. Creates emotional barriers right from the first sentence (accusing employees of lying and cheating, later calling them names), preventing readers from perceiving the intended message
- 2. Presents a restrictive and authoritarian attitude, reflecting an environment that discourages open communication and thus discourages employee candor
- 3. Expresses bias or prejudice (in the slur against women employees)
- 4. Reflects the author's anger and defensiveness ("I simply have no choice")
- 5. Assumes bad employee intentions, underlining the lack of audience-centered thinking
- 6. Uses vague, confusing language (more than 3 times during what period? Will have to answer to the author for what specific penalties?)
- 7. Polarizes workers by inciting conflict between "punctual" employees and others