

2693-220

8/20/2008

1/8



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

AUG 20 2008

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. John Pazdera  
Regulatory Specialist for,  
International Paint, Inc.  
2270 Morris Avenue  
Union, NJ 07083

Subject: Trilux 44-White  
EPA Registration Number 2693-220  
Your Amendment Dated June 19<sup>th</sup>, 2008  
EPA Received Date June 21<sup>st</sup>, 2008

The amendment referred to above, submitted in connection with under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add the use for "pleasure craft", to the product labeling, is acceptable.

A stamped copy of the labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration /reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If the above 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 bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell".

Marshall Swindell  
Product Manager 33  
Regulatory Management Branch I  
Antimicrobial Division(7510P)

2/8

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

AUG 20 2008  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No.  
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# Trilux 44 - White Antifouling Paint

**Active Ingredients:**

1H-Pyrrole-3-carbonitrile, 4-bromo -2-(4-chlorophenyl)-5-(trifluoromethyl)	3.90%
Zinc 2-Pyridinethiol 1-Oxide*	4.12%

**Inert Ingredients:**

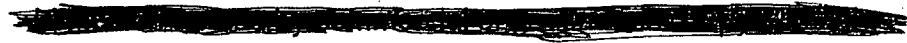
	91.98%
	100.00%

Contains petroleum distillates.

\* Zinc Pyrithione

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**



- See side panel for additional Precautionary Statement-

EPA Reg. No.: 2693-220

EPA Est. No.: 2693-NJ-1

**DISCLAIMER:** The performance of any marine paint or coating depends on many factors outside the control of International Paint LLC including surface preparation, proper application, and environmental conditions. Therefore, International Paint LLC cannot guarantee this product's suitability for your particular purpose or application. IMPLIED WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND OF MERCHANTABILITY ARE EXCLUDED. INTERNATIONAL PAINT LLC 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 International Paint LLC's option.

**NET CONTENTS:  
ONE GALLON (3.875 LITERS)**

**International Paint LLC  
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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
KEEP OUT OF REACH OF CHILDREN  
DANGER**

Danger. Corrosive to the eyes. Causes skin burns. May be fatal if inhaled. Harmful if swallowed. Do not get in eyes, on skin, or on clothing. Wear a face shield. Avoid breathing vapor, mist, dust, or chips from painting or sanding. While spraying paint or sanding boat surface, wear a supplied - air or powered air purifying respirator (PAPR) approved by NIOSH for use with paints and coatings.

Wear a Tyvek hooded coverall or the exact equivalent, coveralls beneath the Tyvek hooded coveralls, impervious gloves, and impervious footwear that protects the lower legs. Remove contaminated clothing and discard after each use, do not reuse. Wash thoroughly with soap and water after handling and before eating and smoking.

**DIRECTIONS FOR USE – Subset A [Commercial Use]**

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

**SURFACE PREPARATION AND COMPATIBILITY:** Surface preparation directions must be followed exactly in order to insure adhesion. Surface must always be clean and dry prior to painting.

**GENERAL APPLICATION PROCEDURES:** Apply using an airless sprayer. Tip Size 21-26 thou inch, pump ratio of 30:1 or greater. For small areas, brush or roller may be used, but multiple coats may be required to achieve the required dry film thickness. It is recommended to apply by airless spray one (1) or two (2) full coats of this product.

**MIXING AND THINNING INSTRUCTIONS:** Mix thoroughly with power mixer prior to application. This coating is designed to be applied without thinning. Should thinning be necessary, consult your International representative prior to altering this coating.

**CLEAN UP:** For tools, equipment, etc., use INTERNATIONAL GTA007.

**MINIMUM DRY AND LAUNCHING TIMES:** Minimum drying time between coats is 6 hours, and before launching is 6 hours at 73°F.

**THEORETICAL COVERAGE:** 401 square feet per gallon, per coat at 2.0 mils D.F.T. Consult your International representative for practical application coverages. Practical square foot coverage per gallon, per coat is directly proportional to surface, application techniques and climatic conditions.

### APPLICATION SYSTEMS

**EXISTING ANTIFOULING SYSTEMS – GOOD CONDITION:** High pressure fresh water wash with a minimum of 2500 p.s.i. and/or scrape to remove all marine growth, slime, salts, etc. Spot blast all areas of corrosion to a Near White Metal Standard of SSPC-SP10-85. Blow down with clean and dry high pressure air to remove all spent abrasives. Apply an approved underwater anticorrosive system.

**POOR CONDITION:** For "optimum" results, blast entire area to a Near White Metal Standard SSPC-SP10-85. Apply an approved underwater anticorrosive system.

**NEW SHIP CONSTRUCTION:** Blast entire area to a Near White Metal Standard SSPC-SP10-85. Blow down with clean and dry high pressure air to remove all spent abrasives. Apply an approved underwater anticorrosive system.

**WOOD AND NON-FERROUS SURFACES:** Use surface preparation and primers as specified by the Navy.

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### FIRST AID

*Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
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**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, and then continue rinsing. Call a Poison Control Center or doctor for treatment advice. *2693-220*

**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 a 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.

**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.

**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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Under the Federal Insecticide,  
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amended, for the pesticide,  
registration number: EPA Reg. No.

## Alternate Directions for Use

### Subset B [Pleasure Craft]

2693-220

**PRODUCT DESCRIPTION:** Trilux 44 was developed for use on aluminum hulled vessels but can be used on fiberglass, wood and steel surfaces. Trilux 44 uses Biolux Technology to control slime and algae growth and a resin system that allows for the controlled release of biocide. This enables the boat to be hauled for extended periods of time and relaunched without recoating which makes antifouling protection possible for more than one season. The performance of Trilux 44 is directly related to the amount of paint applied (Thin film thickness may lead to premature fouling). Trilux 44 is for use on recreational or commercial vessels below the waterline on underwater boat hulls and parts in fresh, salt and brackish water and can be brush or roller applied. Spray application is not recommended.

Trilux 44 is part of International Paint's globally compatible Superyacht antifouling paint system. Trilux 44 is compatible with all Trilux 44 antifouling paints regardless of country of origin. Follow the application instructions for previously painted surfaces. Tin based copolymers should be removed or sealed with a coat of Primocon YPA984.

#### DIRECTIONS FOR USE

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

#### GENERAL APPLICATION PROCEDURES

Apply at least 2-3 full coats of Trilux 44 by brush or solvent resistant 3/8" nap roller. Do not apply thin coats. Keep in mind that the life of the paint is directly related to the amount of paint applied. Certain areas of the hull, such as the leading edge of the keel and rudder, the waterline and the bow stem polish faster than other areas. On these areas we suggest an additional coat of paint to insure that the Trilux 44 does not polish away before other areas of the bottom.

#### PREPARATION

**BARE ALUMINUM** - On small craft where sandblasting is not practical, i.e. aluminum pontoon boats, car top boats etc.; Wipe bare metal with Special Thinner 216 to remove oil and grease. Uniformly, sand surface to a bright finish with medium grit emery cloth. Wipe surface clean of dust. Immediately apply one thin coat of Viny-Lux Primewash 353/354 thinned 25% with Viny-Lux Solvent 355. Allow to dry a minimum of one hour but no more than twenty-four hours then apply Interprotect 2000E/2001E. Apply enough Interprotect 2000E/2001E to obtain a 10 mil dry film thickness. This usually takes 4-5 coats to obtain this thickness, although the amount of paint is more important than the number of coats. Be sure to follow dry times on the Interprotect 2000E/2001E label. When complete, apply at least three coats of Trilux 44. If dry times for Interprotect 2000E/2001E cannot be followed, use the following alternate system. Apply four coats of Primocon over the Viny-Lux Primewash. On rivets

and adjacent areas, apply a minimum of 5 coats of **Primocon**. Finish with at least three coats of **Trilux 44**.

**ALUMINUM- PREVIOUSLY PAINTED WITH ANTIFOULING PAINT.** Remove incompatible antifouling paint (soft, tin-based copolymers or cuprous oxide) and primer (EPOXY PRIMER MAY BE LEFT ON IF IT IS IN GOOD CONDITION) to bare aluminum and proceed with bare system above. If the **Trilux 44** paint and primer system is in good condition, sand with 80-grit sandpaper. Wipe off sanding residue with **Special Thinner 216**. Any areas where the bare aluminum is exposed must be re-sanded with medium grit emery cloth and wiped clean. Immediately apply **Primocon** to bare areas. Then apply at least two additional coats of **Primocon** to the entire underwater surface. Apply three coats of **Trilux 44**.

**ALUMINUM - PREVIOUSLY PAINTED WITH A FACTORY FINISH.** Wipe surface clean with **Special Thinner 216** to remove contaminants. Sand the surface with 120-grit sandpaper. Wipe the surface again with **Special Thinner 216**, to remove sanding residue. Immediately spot prime any bare areas with **Primocon**. Apply at least two full coats of **Primocon** (three coats to riveted areas), to the entire bottom, allowing appropriate dry times. After an overnight dry apply at least three coats of **Trilux 44**.

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**PREVIOUSLY PAINTED SURFACES**

**In Good Condition:**

Rinse with fresh water and allow to dry.

Abrade with 80-grit sandpaper. Remove sanding residue by wiping clean with **Special Thinner 216**.

**In Poor Condition:**

Remove all previous coatings using **Interstrip 299E** and prime the substrate.

**PRIMING**

All preparation for bare substrates is covered on the appropriate primer datasheet.

**BARE FIBERGLASS: - NO SAND SYSTEM:** Clean entire surface thoroughly with **Fiberglass Solvent Wash 202**, changing rags frequently. Before the liquid dries, wipe clean with dry cloth. Be sure all wax and other contaminants are removed; if surface is not clean delamination will occur. Apply one thin, continuous coat of **Interlux Fiberglass Primer**. Follow the primer label directions for overcoating.

**BARE FIBERGLASS - SANDING SYSTEM:** Be sure all wax and other contaminants are removed by cleaning the surface with **Fiberglass Solvent Wash 202**. Wash the surface thoroughly with a rag that has been soaked in **Fiberglass Solvent Wash 202** and before the liquid dries wipe off with a clean dry cloth. Change the rags frequently. After the surface has been cleaned sand with 80-grit sandpaper until

a flat, matte finish has been obtained. Wipe off the sanding residue with **Fiberglass Solvent Wash 202**.

**BARE WOOD:** Sand entire surface thoroughly to a smooth finish with 80-grit sandpaper. Clean off the sanding residue using Special Thinner 216 on a damp rag. Prime with **Primocon**. Apply three coats of **Trilux 44**.

**BARE METAL:** Prime with **Viny-Lux Primewash 353/354** followed by **Interprotect 2000E/2001E** or **Primocon**. Apply three coats of **Trilux 44**.

**PREVIOUSLY PAINTED FIBERGLASS AND WOOD - GOOD CONDITION:**  
Remove all traces of loose paint and contamination by sanding the entire surface with 80 grit sandpaper. Wipe surface clean with Special Thinner 216. Apply 1-2 coats of **Primocon**.

**UNDERWATER METALS INCLUDING SHAFTS, PROPELLERS, TRIM TABS, STRUTS AND THRU-HULL FITTINGS:** These areas require special attention to initial surface preparation in order to improve adhesion. Treat these areas the same as bare aluminum. The longevity of this system will probably not be equal to that of the remainder of the boat due to the RPM's these parts withstand. For more details contact Interlux Technical Service at 1-800-468-7589.

**APPLICATION**

**For applications by residential (non-commercial) users:**

- Do not apply by airless spray
- Do not apply more than one coat of this product within 24 hours
- Apply only in outdoor, non-enclosed spaces

Apply three coats of **Trilux 44** by Brush or roller  
**Thinner:** Special Thinner 216  
**Coverage:** 400 sq. ft./ Gallon.

**BARE FIBERGLASS:** Apply a minimum of three coats of **Trilux 44**.

**BARE WOOD:** Apply the first coat of **Trilux 44** reduced with Special Thinner 216 (10% maximum) to penetrate the porous grain. Fill seams with Seam Compound 30. Apply second and third coats of **Trilux 44** unreduced.

**PREVIOUSLY PAINTED FIBERGLASS AND WOOD - GOOD CONDITION:**  
Apply three coats of **Trilux 44**.

**NOTE:** **Trilux 44** may show a green patina at the waterline, especially when applied in thin coats. This patina does not affect antifouling performance.  
**Important:** Do not apply **Primocon** or **Trilux 44** above the true waterline.

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