

2693-220

07/18/2011

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



Office of Pesticide Programs

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

JUL 18 2011

Attention: John P. Pazdera
Pesticide Registration Manager

Subject: Trilux 44 - White
EPA Registration No. 2693-220
Amendment Dated June 15, 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

ACCEPTED
with COMMENTS
EPA Letter Dated:

JUL 18 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide,
registered under EPA Reg. No. 2693-220

**Trilux 44 - White
Antifouling Paint**
Copper Free Antifouling

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
2270 Morris Ave.
Union, NJ 07083**

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

Corrosive. Causes irreversible eye damage or skin burns. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Harmful if swallowed or inhaled. Do not breathe dust, vapor or spray mist. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

Residential (non-commercial) users are advised to wear chemical resistant gloves, protective eyewear (goggles, safety glasses, or face shield), long sleeved shirt and long pants, socks and shoes. In addition to these minimum PPE, commercial users must wear a disposable coverall with hood and chemical resistant footwear.

While removing existing paint by sanding or blasting, or applying new antifoulant paint, commercial users must wear a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G), or a NIOSH approved full face respirator with an organic vapor removing cartridge with a P100 prefilter. Residential (non-commercial) users are advised to wear the same respirators, cartridges, and prefilters as required by commercial users.

FIRST AID

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.

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, aquatic invertebrates, oysters, and shrimp. 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. Open dumping is prohibited.

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: Nonrefillable 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 ¼ 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.

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
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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.

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APPLICATION SYSTEMS

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 2693-220

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 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.

ALTERNATE DIRECTIONS FOR USE

Subset B [Pleasure Craft]

PRODUCT DESCRIPTION: Trilux 44 is a copper free antifouling that provides excellent protection from shell and weed fouling. It uses Biolux® technology to block slime and Ecomea to ward off barnacles and zebra mussels. The fast dry formula of Trilux 44 allows the boat to be painted and launched quickly and its abrasive action reduces paint build up and helps to improve fuel efficiency. Trilux 44 is available in bright colors and is suitable for use on all boats including fiberglass, aluminum, wood, and steel and can be used in all waters. Trilux 44 can be brush or roller applied.

DIRECTIONS FOR USE

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

GENERAL APPLICATION PROCEDURES

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 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.

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Approximate time it will take to paint your boat

Boat Size	Application Time
14'	40 Minutes per coat
20'	1 Hour 20 Minutes per coat
30'	2 Hours 40 Minutes per coat

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THEORETICAL COVERAGE: 528 ft ² /gal (2 mils dry film thickness)	V.O.C.: Less than 330 grams/liter (2.75 lbs./gallon)
THINNER: SPECIAL THINNER 216	THINNING: Do not exceed 10% by volume

DRY TIMES

Temperature °F (°C)	Touch Dry		Overcoating Time		Immersion Time	
	MIN	MAX	MIN	MAX	MIN	MAX
41°F (5°C)	6 hrs	12 hrs	NA	NA	18 hrs	NA
50°F (10°C)	3 hrs	6 hrs	NA	NA	9 hrs	NA
73°F (23°C)	2 hrs	4 hrs	NA	NA	6 hrs	NA
95°F (35°C)	1 h	2 hrs	NA	NA	4 hrs	NA

*If the air temperature falls below 41°F (5°C) during the 4 hour dry time extend the dry times to 24 hours minimum.

COMPATIBILITY: Trilux 44 is compatible with most other antifouling paints and can be applied after sanding the surface. Tin based copolymers should be removed or sealed with Primocon YPA984 or TBT Sealer YPA987.

PREPARATION

BARE FIBERGLASS: It is very important that bare fiberglass be properly prepared to remove the mold release wax completely to prevent delamination of the antifouling paint. Begin by scrubbing the surface thoroughly with a stiff brush using soap and water to remove loose dirt and contamination. Flush with fresh water to remove the soap residue and allow to dry. Remove mold release wax using one of the following Interlux products. **Fiberglass Surface Prep YMA601**, **Fiberglass Solvent Wash 202** or **Low VOC Fiberglass Solvent Wash 202V** 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.

BARE FIBERGLASS - NO SAND SYSTEM: Clean the surface following the preparation procedure above. Repair any surface imperfections using Interlux Watertite filler. Sand and wipe clean. Apply one coat, using one of the following Interlux products **InterProtect® 2000** or **No Sand Primer YPA200**, following the label instructions for applying the primer and overcoating with antifouling paint.

BARE FIBERGLASS - SANDING SYSTEM: Clean the surface following the preparation procedure above. Repair any surface imperfections using Interlux Watertite filler. Sand and wipe clean. 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. Prime with **Primocon** thinned 10% with **Special Thinner 216** or thin first coat of **Trilux 44** 10-15% with **Special Thinner 216**. Apply two more coats of this product unthinned, allowing appropriate dry times.

ALUMINUM & UNDERWATER METALS – Please check datasheet for preparation to aluminum and underwater metals or contact Interlux Technical Service at 1-800-468-7589.

PREVIOUSLY PAINTED SURFACES

In Good Condition: Remove all contamination. Sand the entire surface with 80 grit sandpaper; remove sanding residue.

In Poor Condition: Remove all previous coatings using **Interstrip 299E** and proceed with the system for the bare substrate.

APPLICATION

After the surface has been properly prepared and cleaned as above, apply two coats of **Trilux 44** (3 on bare wood) by brush or roller (Residential users). Commercial (non-residential) users may apply **Trilux 44** by airless spray while wearing the proper personal protective equipment.

NOTE: Important: Do not apply **Trilux 44** above the true waterline.

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registered under EPA Reg. No. 2693-22D