



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 8, 2019

Bathsheba Njuguna
PSRA Team Leader
International Paint, LLC
6001 Antoine Drive, Houston, TX 77091

Subject: Label Amendment – Update usage and directions
Product Name: FLEX POLISHING AF
EPA Registration Number: 2693-236
Application Date: September 5, 2019
Decision Number: 555366

Dear Ms. Njuguna:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Mohammad Alavi by phone at (703) 347-0522, or via email at Alavi.mohammad@epa.gov.

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Sincerely,

A handwritten signature in blue ink that reads "E. Miederhoff". The signature is written in a cursive style with a large, stylized initial "E".

Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

FLEX POLISHING AF

- [Multi-Seasonal Polishing Antifouling]
- [Copper Free Formula -One Paint for Your Underwater Hull]
- [Water-based Antifouling for Easy Application and Clean Up]
- [Copper Free Water-based antifouling]

ACCEPTED

10/08/2019

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 2693-236

Alternate Brand Names (ABNs)

[INTERLUX [ALTERNATE BRAND NAME]]

[MICRON® Navigator Biolux® with ECONEA™]

KEEP OUT OF REACH OF CHILDREN

DANGER

See side panel for additional Precautionary Statements

NET CONTENTS: ONE GALLON (3.875 LITERS)

EPA Reg. No.: 2693-236

EPA Est. No.: 2693-TX-1

Active Ingredients:	Percentage
1H-Pyrrole-3-carbonitrile, 4-bromo -2-(4-chlorophenyl)-5-(trifluoromethyl)	4.85%
Zinc 2-Pyridinethiol 1-Oxide(Zinc Pyrithione)	3.80%
Other Ingredients:	<u>91.35%</u> 100.00%

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.

International Paint LLC
6001 Antoine Dr.
Houston, TX 77091

Interlux.com

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

KEEP OUT OF REACH OF CHILDREN

DANGER

Corrosive. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Harmful if swallowed or inhaled. Do not breathe dust, vapor or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Residential (non-commercial) users **MUST** 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 minimum of an NIOSH approved particulate filtering facepiece respirator with any N, R, P filter (NIOSH approval number prefix TC-84A); or a NIOSH approved powered air purifying respirator with an HE filter with NIOSH approval number prefix TC-21C. Residential (non-commercial) users **MUST** wear the same respirators, cartridges, and N, R, or P filters as required by commercial users.

FIRST AID	
If in eyes:	<ul style="list-style-type: none">• 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 eye.• Call a poison control center or doctor for treatment advice.
If Swallowed:	<ul style="list-style-type: none">• 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 inhaled:	<ul style="list-style-type: none">• Move 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.
If on skin or clothing:	<ul style="list-style-type: none">• 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.
Other: Have the product container or label with you when calling a poison control center or doctor or going for treatment. For medical emergencies, call the poison control center at 1-800-222-1222. For general information on this product, contact the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at http://npic.orst.edu .	

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.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Pesticide product should be kept in securely closed containers. Mixed Paint should not be stored under any circumstances. Exposure to air and extreme of temperature should be avoided. Keep out of direct sunlight.

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 HANDLING: 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.

DIRECTIONS FOR USE

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

[ALTERNATE BRAND NAME]

PRODUCT DESCRIPTION: [Alternate Brand Name] is a water-based, copper free antifouling formula with all the proven benefits of the Micron® antifouling range: long lasting, multi-season polishing protection resulting in superior performance. [Alternate Brand Name] utilizes Econeal™ alongside Biolux® Technology to boost antifouling performance in all waters and conditions. Engineered to be faster drying with lower temperature application that delivers the speed, flexibility and convenience for boaters and applicators to meet their schedules. Easily applied over most antifouling paints and can be used on any substrate, including aluminum and primed underwater metals. [Alternate Brand Name] is the ideal antifouling paint you want for the entire bottom of your boat.

COMPATIBILITY: [Alternate Brand Name] can be applied over most antifouling paints as long as the old coating is tightly adhered and is in sound condition. When applying over conventional antifouling paints, thoroughly sand with 80 grit wet-or-dry sandpaper. If applying over self-polishing type copolymer antifouling, heavy sanding is required. Soft rosin-based coatings should be removed prior to application of [Alternate Brand Name].

V.O.C.: 8.89 grams/liter as supplied

COATS REQUIRED: 2 coats. 3 coats on bare wood

THINNER: Water

THINNING: Thin only if necessary. Do not exceed 10% by volume

CLEAN UP: Soap and water. Be sure to observe proper disposal procedures for all antifouling paints.

THEORETICAL COVERAGE: 408 sq. ft./gal/coat.

APPLICATION TEMPERATURE: 41°F (5°C) and above.

APPLICATION SYSTEMS

Stir thoroughly. Apply at least two full coats [Alternate Brand Name] by synthetic brush or 3/8" nap roller. Do not apply thin coats. If during application, the brush or roller drags, thin with clean tap water to improve handling.

PREVIOUSLY PAINTED SURFACES - GOOD CONDITION: Remove all traces of loose paint and contamination by sanding the entire surface well with 80 grit sandpaper; wipe surface clean with tap water. Apply at least two coats of [Alternate Brand Name], allowing proper dry times. See compatibility section for additional information.

PREVIOUSLY PAINTED SURFACES - POOR CONDITION: Completely remove all old antifouling paint with paint stripper and proceed with application system for bare work as described below.

BARE FIBERGLASS (Polyester or Vinylester) - 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 YMA601V 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 - NO SAND SYSTEM: After the surface has been prepared as described above – Apply one continuous coat of [Fiberglass No Sand Primer YPA200 or

InterProtect 2000E] with brush or roller. Follow label directions for overcoating. Apply at least two coats of [Alternate Brand Name] following dry times below.

BARE FIBERGLASS - SANDING SYSTEM: After the surface has been prepared as described above – Sand entire surface well with 80 grit sandpaper until a flat, matte finish is obtained; wipe off sanding residue with FIBERGLASS SOLVENT WASH 202™. Apply two coats of [Alternate Brand Name] following dry times below.

BARE WOOD: Sand entire surface with 80 grit sandpaper. Wipe off sanding residue. Repair any imperfections with WATERTITE EPOXY FILLER; sand and wipe clean. Apply first coat of [Alternate Brand Name] reduced with tap water (10% maximum). Apply two additional coats unreduced following proper dry times between coats. Fill seams (if necessary) with SEAM COMPOUND 30 between first and second coats of antifouling paint.

ALUMINUM & UNDERWATER METALS: Gritblast or sand with medium grade (grit) emery cloth to a bright metal finish and wipe clean. Apply one coat of InterProtect 2000E that has been thinned 15-20% with Reducing Solvent 2316N. Apply InterProtect 2000E the same day as blasting or sanding. Apply 3-4 additional coats of InterProtect 2000E unthinned. When the InterProtect 2000E is thumbprint tacky, apply the first coat of [Alternate Brand Name]. Apply second coat of [Alternate Brand Name] following the proper dry times.

FACTORY FINISHED ALUMINUM: Prime with Primcon. Apply 2 coats of [Alternate Brand Name] following dry times.

NOTE: Keep from freezing.

Temp °C	Overcoating Time		Launch Time		
			Dry 50% Relative Humidity	75% Relative Humidity	Humid 85% Relative Humidity
	Min	Max	Min	Min	Min
45°F (5°C)	6 hrs.	30 days	48 hrs	72 hrs	96 hrs.
50°F (10°C)	4 hrs.	30 days	8 hrs.	16 hrs.	48 hrs.
73°F (23°C)	2 hrs	30 days	6 hrs.	12 hrs.	36 hrs
95°F (35°C)	1 hrs	30 days	1 hr.	6 hrs.	24 hrs

Drying times are based on humidity levels of 50% RH. Drying/immersion times will vary depending on relative humidity. At higher humidity, the drying/immersion times will be greater at all application temperatures.