



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 25, 2021

Vanessa Villagran
PSRA Specialist
International Paint, LLC
6001 Antoine Drive
Houston, TX 77091

Subject: Label Amendment – Add ABNs, and update several sections of the label
Product Name: Intersmooth 7670
EPA Registration Number: 2693-237
Application Date: November 6, 2020
Action Case Number: 00217168

Dear Ms. Villagran:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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.

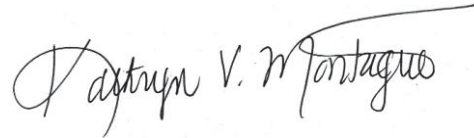
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed 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 FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). 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) lists 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, FIFRA section 12(a)(1)(B). 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 Assurance.

Page 2 of 2
EPA Reg. No. 2693-237
Action Case Number: 00217168

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, you may contact Joseph Daniels at (703) 347-8669 or via email at Daniels.joseph@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Kathryn V. Montague
Senior Regulatory Advisor
Antimicrobials Division, 7510P
US EPA

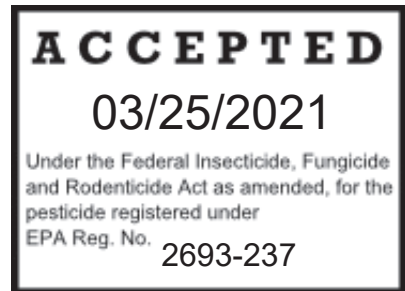
Enclosure

INTERSMOOTH 7670

[Antifouling Paint]
[Copper Free Antifouling]

Alternative Brand Names (ABNs)

- [INTERSMOOTH 7670 RED]
- [INTERSMOOTH 7670 BROWN]
- [INTERSMOOTH 7670 SPC BROWN]
- [INTERSMOOTH 7670 SPC RED]



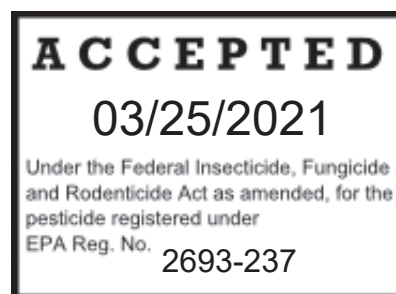
[FRONT PANEL]

KEEP OUT OF REACH OF CHILDREN

NET CONTENTS: ONE GALLON (3.785 LITERS)



DANGER/PELIGRO/POISON



EPA Reg. No.: 2693-237
EPA Est. No.: 2693-TX-1

Active Ingredients:	Percentage
1H-Pyrrole-3-carbonitrile, 4-bromo -2- (4-chlorophenyl) -5- (trifluoromethyl)	5.70%
Zinc 2-Pyridinethiol 1-Oxide*	7.16%
Other Ingredients:	87.14%
	100.00%

Contains Petroleum Distillates, xylene or xylene range aromatic solvents

* Zinc Pyrithione

[DISCLAIMER: The performance of any marine paint or coating depends on many factors outside the control of INTERNATIONAL PAINT, LLC., including surface preparations, proper application and environmental conditions. Therefore, INTERNATIONAL PAINT, LLC., cannot guarantee this product's suitability for your particular purpose of application. To the extent consistent with applicable law, INTERNATIONAL PAINT, LLC., EXPRESSLY DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES INCLUDING, WITHOUT LIMITATION, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE or otherwise that extend beyond the statements made on this label, and shall not be liable for special, incidental, or consequential damages resulting from the use or handling of this product, the exclusive remedy being the replacement of this product. To the extent consistent with applicable law, buyer/user assumes all risk of possession, handling, or use of this material when use and/or handling is contrary to label instructions.]

International Paint LLC
6001 Antoine Dr.
Houston, TX 77091
[interlux.com]

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, and then continue rinsing. • Call a Poison Control Center or doctor for 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.
If swallowed:	<ul style="list-style-type: none"> • 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 inhaled:	<ul style="list-style-type: none"> • 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.
<p>General Information: 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.</p>	

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for additional Precautionary Statements.

[SIDE PANEL]

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

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

KEEP OUT OF REACH OF CHILDREN



DANGER/PELIGRO/POISON

DANGER. Corrosive. Causes irreversible eye damage or skin burns. Fatal if swallowed, or absorbed through skin, or inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin, or on clothing. Do not breathe vapor or spray mist. Wear the proper Personal Protective Equipment as specified below. 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 use.

PERSONAL PROTECTIVE STATEMENT (PPE)

Applicators and other handlers must wear:

- Goggles or face shield,
- Coveralls over long-sleeved shirt and long pants,
- Socks and chemical resistant footwear
- Chemical-resistant gloves (such as Barrier Laminate, Butyl nitrile, Neoprene Rubber, PVC, or Viton >14 mils)
- Wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges and combination N1, R, or P filters; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air purifying respirator with OV cartridges and combination HE filters.

USER SAFETY REQUIREMENTS

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

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 particulate 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 Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent to sewer systems 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.

[Subset A for Marine Commercial Use]

[INTERSMOOTH 7670, Alternate Brand Name]

PRODUCT DESCRIPTION: A high performance, tributyltin (TBT) free, Copper free, polishing antifouling resistant to algae, barnacles and other marine fouling's. For use in fresh, salt and brackish waters. Prevents coating build-up. At subsequent dry dockings, it is only necessary to top up the system. This antifouling paint is for industrial use and professional application only. Not for sale to the general public.

DIRECTIONS FOR USE

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

Worker Protection

Alternate Language for occupational handlers in the sprayman position applying products containing Tralopyril:

Occupational handlers in the spray man position applying this product are required to wear a NIOSH approved full facepiece supplied-air respirator (PF 1000) during use OR a continuous flow supplied air or powered air purifying respirator equipped with a hood that covers the face, neck, and shoulders. The air or powered air purifying respirator is required to have an assigned protection factor of 1,000, per NIOSH standards, and must be used with an organic vapor cartridge and a high efficiency (HEPA) pre-filter. The spray man must wear safety glasses beneath the hood respirator.

Alternate language for occupational handlers in the line tender position applying products containing Tralopyril

Occupational handlers in the line tender position applying this product are required to wear a NIOSH approved air-purifying half-face mask elastomeric respirator (PF 10) with any R or P filter during use.

Respirator Fit Testing, Medical Qualification and Training (all uses)

Using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134), employers must verify that any handler who uses a respirator is:

- Fit-tested and fit-checked
- Trained, and
- Examined by a qualified practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status of respirator style or use-conditions change.

Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

STORAGE AND DISPOSAL

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

STORAGE: Exposure to air and extremes of temperature must be avoided. Keep the container firmly closed. Keep out of direct sunlight. Keep the containers in a dry, cool, well ventilated space and away from sources of heat and ignition.

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. Prior to container disposal, allow any remaining paint residue in the container to air dry. Dispose of the container in accordance with Federal, State or local disposal regulations.

[For Chemical Emergency, Spill, Leak, Exposure or Accident, Call Toll Free – Day or Night – CHEMTREC 1-800-424-9300. Medical Advisory Number – Contact your Local Poison Control Center or Call 1-800-854-6813.]

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 25-30 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) or three (3) 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 4 hours, and before launching is 12 hours at 73°F.

THEORETICAL COVERAGE: 228 square feet per gallon, per coat at 4.0 mils DFT. 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 3000 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 SSPCSP10-85. 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] [Alternate Brand Name]**

PRODUCT DESCRIPTION: This product is a copper free antifouling that provides excellent protection from shell and weed fouling. It uses Biolux® technology which helps protect against weed, slime and algae growth. The fast-dry formula of this product allows the boat to be painted and launched quickly and its ablativ-action reduces paint build up and helps to improve fuel efficiency. This product 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. This product 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.

DO NOT APPLY BY SPRAY APPLICATOR.

STORAGE AND DISPOSAL

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

STORAGE: Exposure to air and extremes of temperature must be avoided. Keep the container firmly closed. Keep out of direct sunlight. Keep the containers in a dry, cool, well ventilated space and away from sources of heat and ignition.

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. Prior to container disposal, allow any remaining paint residue in the container to air dry. Dispose of the container in accordance with Federal, State or local disposal regulations.

GENERAL APPLICATION PROCEDURES

For applications by residential (non-commercial) users: Apply only in outdoor, non- enclosed spaces. Apply 2-3 full coats of this product 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 ensure that this product does not polish away before other areas of the bottom.

THEORETICAL COVERAGE: 528 ft ² /gal (2 mils dry film thickness)	V.O.C.: Less than 383 grams/liter (3.19 lbs. /gallon)
THINNER: [Special Thinner 216, Special Thinner]	THINNING: Do not exceed 10% by volume

DRY TIMES

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

*If the air temperature falls below 41 °F (5°C) during the 6-hour dry time extend the dry times to 24 hours minimum.

COMPATIBILITY: This product 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**.

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 YMA601V, Fiberglass Surface Prep, Fiberglass Solvent Wash 202, Fiberglass Solvent Wash**] 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 of, [**InterProtect® 2000E, InterProtect**], 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, Fiberglass Solvent Wash**].

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, Special Thinner**] or thin first coat of this product 10-15% with [**Special Thinner 216, Special Thinner**]. Apply two more coats of [alternate name brand, this product] unthinned, allowing appropriate dry times.

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

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 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 this product (3 on bare wood) by brush or roller (Residential users).]

NOTE: Important: Do not apply this product above the true waterline.