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5204-64

AUG 17 1990

M and T Chemicals, Inc.
One Woodbridge Center
Woodbridge, NJ 07095

Attention: Judith L. Kranetz

Gentlemen:

BEST AVAILABLE COPY

Subject: Poly-Flo 201A White
EPA Registration No. 5204-64
Your Submission Dated October 9, 1989
EPA Received Date October 18, 1989

This is in response to your October 9, 1989 submission. The revised Confidential Statement of Formula of February 13, 1989 agrees with the label and it contains a certification statement that the tributyltin release rate is at or below the 4.0 mg/cm²/day, the limit imposed by the Organotin Anti-Fouling Paint Control Act (OPPCA) of 1988 and is acceptable.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below.

1. The submission does not include "prototype specifications and materials for a certification and training program, etc.," as requested in item 3 of our last letter to you dated September 8, 1989.
2. Please submit a copy of the specifications for certification and training from the National Paints and Coatings Association.
3. The White (or clear) formulation is acceptable. The ^{TBT} Pin Release study was also conducted using this pigment. However, the Blue formulation needs to have the ^{TBT} Pin Release study done on it.

CONCURRENCES

SYMBOL	58521-1:WP5.0:Dutch:C.DISK:RENCO:07/27/90:DD:vo:ek:de					
SURNAME	H-75050 U. Dutch					
DATE	8/17/90					

4. There appears to be no ^{IBT} Pin Release study using the Black pigment.
5. Under the rules of the OPCA, you can no longer market the blue and black formulations.


Submit five (5) copies of your final printed labeling before you release the product for shipment.

Please make sure that your final printed labeling complies with the May 21, 1990 Label Improvement Program Notice mailed to you.

A stamped copy of the labeling is enclosed for your records.

Should you have any further questions, please contact Veronica Dutch at (703) 557-7404.

Sincerely yours,

John H. Lee 
Product Manager (31)
Antimicrobial Program Branch
Registration Division (H7505C)

Enclosure

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M&T* Polyflo 2001A

Antifouling Paint

For protecting surfaces from marine fouling and slime.

Active Ingredients: Tributyltin Fluoride	4.0%
Tributyltin Methacrylate (as part of a polymer)	10.7%
Inert Ingredients:	85.3%
Total Tin content (both active ingredients) 5.0%	Total 100.0%

DANGER! KEEP OUT OF THE REACH OF CHILDREN

PRECAUTIONARY STATEMENTS

DANGER! HAZARD TO HUMANS & DOMESTIC ANIMALS

Corrosive. Causes severe skin and eye damage. Do not get on skin, clothing or in eyes. Wear a face shield and rubber gloves when handling. Use in a well ventilated area. When used in confined areas or applied by spraying, wear protective clothing and a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR 11. Harmful if swallowed or inhaled. Do not breathe vapors or spray mist.

PRACTICAL TREATMENT: In case of skin contact remove contaminated clothing and immediately wash skin with soap and water. Get medical attention. Wash contaminated clothing before reuse. If inhaled, remove to fresh air. Use artificial respiration if breathing has stopped. Get immediate medical attention. If swallowed, do not induce vomiting. The product contains petroleum distillates. Get medical attention. If in eyes, flush eyes with water. Get medical attention. **NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARD: This product is toxic to fish and wildlife. Do not apply directly to water. Do not contaminate water by cleaning equipment or disposal of waste.

CHEMICAL AND PHYSICAL HAZARDS: Do not use near heat or open flame.

FLASH POINT 85°F PAINT LIQUID

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labelling. POLYFLO is an antifouling paint suitable for use on aluminum and fiberglass vessels subject to attack by marine organisms and other fouling organisms. The surface should be prepared for application. A suitable anticorrosive coating should be applied to the surface. It is recommended for wood or fiberglass. Application of Polyflo is strongly recommended if spraying. All applicators must use appropriate NIOSH approved respirators. Rubber gloves and goggles should be worn by applicators. Equipment should be laundered before reuse, disposable suits should be discarded. Naphtha or mineral spirits. Vessel may be launched.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Pesticide Disposal: Pesticide, paint or rinsate that cannot be used according to label should be disposed of according to Federal, State or local regulations. Conservation and Recovery Act. Container Disposal: Triple rinse (or equivalent) and offer for recycling or reuse, or burn in a sanitary landfill, or by other approved State or local regulations.

M&T
CHEMICALS INC.

N.J.R. 576-10000

GENERAL OFFICES, RAHWAY, NEW JERSEY 07065

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ACCEPTED
EPA COMPLIANCE
D-1000 Letter Batch

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It is unlawful to use this product on nonaluminum hulled vessels less than 62 feet (25 meters) in length (on decks) except for the outboard motor or lower drive unit of such vessel.

Restricted Use Pesticide due to toxicity to Aquatic Organisms Including Shellfish: For sale only to certified commercial applicators and for use only by persons under the direct supervision of an on-site (at the work-site) certified commercial applicator. These restrictions become effective on March 1, 1990.

During and after paint removal and/or application of new TBT paint, methods must be employed which are designed to prevent release of TBT paints into the aquatic environment. Following removal of old TBT paint and/or application of new TBT paint, all paint chips and spent abrasives, paint containers, unused paint, and any other waste products from paint removal or application must be disposed of in a sanitary landfill.

Users must comply with all applicable OSHA requirements.

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