

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 11 1991

Rule Industries, Inc.
Cape Ann Industrial Park
Gloucester, MA 01930

Attention: Leon Abelon

Subject: Gloucester Commercial 502 Red
EPA Registration No. 7995-21
Amendment Dated August 30, 1990

The amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes below.

1. Revise your storage and disposal statement to read as follows:

STORAGE AND DISPOSAL

Do not contaminate water, food, feed by storage or disposal. Open dumping is prohibited.

PESTICIDE DISPOSAL

Paint that cannot be used according to label instructions must be disposed of according to federal, state or local procedures under the Resources Conservation and Recovery Act.

CONTAINER DISPOSAL

Dispose of container by triple rinse and recycling or puncturing and disposing in a sanitary landfill or by other approved State and local procedures. If burned stay out of smoke.

The heading "STORAGE AND DISPOSAL" must be of the same type size as the child hazard warning statement.

2. Delete the phrase "Tin Free" from the label, this is an implied safety claim.

3. The child hazard warning statement on the front panel is the wrong type size. Refer to the enclosure "The Label" for labeling type size requirements. Please note that the minimum type size for labels is 6 points.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

4. Change the phrase "Practical Treatment" to "Statement of Practical Treatment". Also print this heading in the same bold lettering as the other headings.


5. Move the "Note" section so that it directly follows the Precautionary Statements section, and appears before the Statement of Practical Treatment section.

6. Revise the sentence "If swallowed,...quantities of water" to read "If swallowed, promptly drink large quantities of water."

If you have any questions concerning this letter please call Marshall Swindell at (703) 557-6908.

A stamped copy of the label is included for your records.

Sincerely yours,


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

Commercial Anti-Fouling Bottom Paint

502 Red

WARNING

KEEP OUT OF REACH OF CHILDREN.
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT
Cuprous Oxide 25.2%
WATER INSOLUBLE 74.8%
Total 100.0%
*Total Copper Metal 22.4%

ONE U.S. QUART 946 ML

Gloucester® Commercial Bottom Paint

Commercial is a popular general purpose bottom paint resistant to algae, barnacles and other marine fouling. Effective in both salt and fresh water. It is recommended for medium and low speed boats.

Directions for Use

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

Fiberglass: New fiberglass bottoms must be deaired using #551 Epoxy Thinner or a suitable paint thinner or detergent wash. Sand with 80 to 100 grit paper and prime with #8370 or #375 Epoxy Primer. On surfaces already painted and in good condition, sand to desired smoothness. Surfaces in poor condition should be stripped and treated as if new surface.

Wood: This paint can be applied directly to new wood bottoms after sanding smooth. Previously painted bottoms on which the old paint is in good condition may be recoated after sanding off all loose dirt. Where old paint is loose and flaking in large areas, strip it off and proceed as for new unpainted work.

Metal: Bring new metal to bright finish and prime with two coats of #8374 Epoxy Red (red primer). On previously painted surfaces, loose or flaking spots in the old coating should be cleaned down to bright metal by wire brushing, power sanding or sandblasting and immediately spot-primed. At least one additional coat of primer should be applied to these spots before finish-coating.

Application Information

Sar thoroughly. Allow at least four hours between coats and before launching. Two coats are recommended for best results. If thinning is necessary, a little turpentine or paint thinner can be used for this purpose, as well as cleaning brushes and equipment. Average coverage is 350-400 sq. ft./gal. Application may be by brush, roller or spray. Temperatures should be 40° or above. Surfaces should be dry and clean with loose or flaking paint completely removed. Apply under good drying conditions.

Note: While spraying and/or sanding local surface, wear a mask or a respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health.

Maintenance

Since man-made and natural pollution can reduce the effectiveness of all antifouling paint, it is recommended that the bottom paint be checked from time to time, and lightly scrubbed with a soft material.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Paint that cannot be used according to label instructions must be disposed of according to federal, state or local procedures under the Resource Conservation and Recovery Act. Dispose of container by triple rinse and recycling or disposing in a sanitary landfill or by other approved state and local procedures.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

WARNING

Use only with adequate ventilation. Avoid contact with skin, eyes or clothing. Remove contaminated clothing and wash before reuse. Causes eye irritation. May be fatal if swallowed or inhaled. Harmful if absorbed through skin. Do not breathe vapors or spray mist. Wash thoroughly after use and before eating or smoking. Wear protective clothing, e.g. gloves, hat, shirt and pants.

Practical Treatment: If swallowed, promptly drink a large quantity of milk, egg whites, gelatin solution, or if not available, drink large quantities of water. Avoid alcohol. Get medical attention.

If in eyes, flush eyes with water. Get medical attention. If on skin, wash with soap and water. Get medical attention. If inhaled, remove victim to fresh air. If not breathing, give mouth-to-mouth respiration. Get medical attention.

ENVIRONMENTAL HAZARD

This product 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.

PHYSICAL OR CHEMICAL HAZARD

Combustible. Do not use or store near heat or open flame.

E.P.A. Registration #7965-21
E.P.A. Est. #7966-MA-1

Rule 100000, Inc.
Cape Cod Industrial Co.
Beverly, Massachusetts 01915 U.S.A.
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ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 11 1991

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

7995-21