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Ameron Protective Coatings Group 201 North Berry Street P.O. Box 1020 Brea, CA 92621

Attention: Mr. R.L. Doyle

Gentlemen:

Subject: American 698BS Antifouling Red EPA Registration No. 8120-48 Your Submission Dated March 2, 1988 EPA Received Date March 9, 1988

The submitted label and technical sheet comply with the comments made in our February 15, 1988 letter, and are acceptable provided that you:

- Make the label changes listed below before you release the product for shipment.
  - Comply with the "Type Size" and "Final Label" requirements as given in "The Label," "Type Size," and "A-79" enclosures.
- Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of the Federal Insecticide, Fungicide, and Rodenticide Act. Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

CONCURRENCES								
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We note that your above response to our letter of February 15, 1988 did not include the corrected "application instructions." See our comment #2 in that letter.

If you have any questions concerning this letter, please call Mr. Edmond Prominski at (703) 557-7404.

Sincerely yours,

Product Manager (31) Disinfectants Branch

Registration Division (TS-767C)

Enclosures

PRECAUTIONARY STATEMENTS

Danger. Corrosive. Causes skin burns. Hear protective clothing such as gloves, long-sleeved cotton shirt, long pants, and hat. Causes eye irritation. May be fatal if swallowed. Harmful if absorbed through skin or inhaled. This product may be a dermal sensitizer. Avoid contact with skin, eyes, or clothing. Avoid breathing (vapor; spray mist; dust or chips from sanding). Hear a mask or respirator jointly approved by the Mining Safety and Health Administration >-.'w National Institute for Occupational Safety and Health. Wash thoroughly with soap and water after handling and before eating or smoking. Use with adequate ventilation.

STATEMENT OF PRACTICAL TREATMENT: If swallowed, drink promptly a large quantity of milk, egg white, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

If in eyes: Flush with plenty of water and get medical attention.

If on skin: Wash with plenty of soap and water.

If inhaled: Remove victim to fresh air.

If not breathing, give artificial respiration, preferably mouth-to-mouth.

Get medical attention:

ENVIRONMENTAL HAZAROS - This external is toxic to fish. Do not apply directly to water by cleaning of equipment, or disposal of wastes. Do institution chips and dust generated during paint removal to enter water. Dispose of paint debris in an approved landfill.

COMMODITY NO.

AMERCOAT 698 HS ANTIFOULING RED

Active Ingrdients: Tributyltin methacrylate as (as part of polymer)

9.5%

Cuprous oxide

16.7%

Copper as metallic: 14.8% Total tin as metallic: 3.0%

Contains Petroleum Distillates

KEEP OUT OF REACH OF CHILDREN

DANGER! Corrosive

See left side panel for additional precautions

Use only in accordance with instructions accompanying shipment.

EPA Est. No: 8120 CA Thin CONDIENTS
EPA Registration Note 122 Legistration Dated:

FOR USE IN CONNERCIAL MAREPYRADS ONLY

Under the Federal insecticide, Fungicide and Rodemicide Act as Fungicide, and Rodemicide Act as emended, for the pasticide amended, under EPA Ros. No.

AMERON Protective Coatings Division
Home Office: 201 N. Berry Street,
Brea. California 92621

PHYSICAL OR CHEMICAL Flammable. Keep as arc and open flame. eliminate all source:

DIRECTIONS FOR USE
It is a violation
this product in a m
its labeling. See
futher use instruction

STORAGE AND DISPOSAL Keep container clo Store in cool, dry Do not contaminate storage or disposal. Pesticide Disposal: toxic. Improper di or its rinsate is Law. If this produc by use according contact your State mental Control Age Representative at t Office for guidance. Container Disposal equivalent. Then reconditioning, or in > sanitary la approved state and 1

WARRANTY
Refer to Ameron's
Ameron's warrant
instructions for thi

DOT-Paint UN-1263
PHOTOCHEMICAL RULE 1
NET CONTENTS:

0630q

Form 5873 (R2/88)

Provides for hull roughness control

Americant 698HS is designed to release a constant amount of balanced toxicant to achieve control without excessive erosion. Americant 698HS is equally effective whether the vessel is stationary or moving at full speed.

Roughness and Fuel Consumption — The Americat 698HS antifouling system is truly economical, minimizing drag and keeping it under control. Typical applications include the following:

- The surface is initially prepared by sandblasting to remove old coating and corrosion and reduce profile to 75 to 100 microns. When the vessel is new, prepared surface roughness should be close to this value.
- An Ameron-recommended anticorrosive system and 2 coats of America 698HS are applied.
   In most cases, this will reduce microroughness to the 20 to 25 micron range, approaching hydrodynamic smoothness.
- For maintenance and repair, the existing coating having a roughness of 200 to 250 microns can be reduced to the range of 20 to 25 microns by using an Ameron-recommended tiecoat and 2 coats of Amercoat 698HS.
- 4. Because Amercoat 698HS is polishing, gross surface imperfections due to application will be reduced in service. Further, because Amercoat 698HS is hard relative to the usual polishing type coatings, major changes in surface micro-roughness will be minimal during its service life and it will not be subject to excessive damage and wear.

Ablation or Erosion - Because of its design, Americat 698HS does not depend on erosion to deliver toxicant or to achieve drag control. The measured erosion rate of America 698HS at 15 knots is less than 6 microns per month. This low polishing rate provides a mechanism for removal of physical imperfections, but does not sacrifice coating life.

1	Camponents	1				
	Curing mechanism	Solvent release				
	Volume solids (ASTM 02697)	54% ± 3**				
	Dry film thickness	6 mils (150 microns)				
	Coats	2				
	Theoretical coverage <sup>2</sup>	ft <sup>2</sup> /gal <del>m²</del> L				
	1 mil ( 25 microns)	866 21.2				
	6 mils (150 microns)	144 3.5				
	VOC	3.4 lb/gal (411.6 g/L)				
	VOC thinned	3.6 lb/gal (436 g/L)				
	Flash point (SETA)	<del>•</del> F•C				
	Americaat 698HS	72 22				
	Amercoat 65	78 25				
	Amercoat 101	145 63				
	Amercoat 12	0 -18				
	Application Data <sup>3</sup>					
	Applied over	Primed steel				
	Surface preparation	Abrasive blast or high				
	Juli ace preparation	pressure water cleaning				
	Method	Airless or conventional				
	THE GROW	spray				
	Environmental conditions					
	Temperature	<u>•F</u> •C				
	air and surface	0 to 120 -18 to 49				
	Surface temperature at le	ast 5°F°73°C) above de				
	point to prevent condensation					
Drying time (ASTM D1646) (hours)						
	*F/*C .90/35 recoat :1:	70/21:50710 32/0 0/-18 2 • 4 8 24				
	Cure time before service (ho	wine) e a				
	immersion 8	16.**.24 48 96				
		•• •				
	Thinner	Americat 65, 101				
	Cleaner	Americat 12				

High Solids - Americal 698HS, is a new generation antifouling coating based on the most current polymer technology. The high-solids content of Americal 698HS provides improved economy in application costs, time and reduction in volume of coating used.

## Application Data Summary :

for complete information on drying times, procedures, environmental requirements, equipment and safety precautions, see application instructions. This product must be applied as recommended to obtain the maximum protection for which the coating is formulated.

Notice: This product is for industrial use only.

## **Harranty**

This warranty is supersedes Section 6 of Ameron Protective Coatings Division's Standard Terms and Conditions of Sale as listed on the invoice.

Ameron warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to i the directions for use, subject to the inherent risks referred to below. Ameron makes no other warranty express or implied of fitness or merchantability or any other express or implied warranty. If a product does not conform with this warranty, Buyer must notify Ameron within five days of discovery of the defect, but in no event later than one year after delivery date or the expiration of the applicable shelf life, whichever is shorter. Ameron's sole obligation under this warranty shall be at its option, to credit Buyer's account, or to supply replacement material or repair. failure to notify Ameron of nonconforming goods under this warranty, within the time specified above, shall bar buyer from recovery hereunder. In no case shall Ameron be liable for consequential, special, indirect, punitive or other damages resulting from the use cremandling of this product. Ameron offers this product and Buyer accepts it, subject to the conditions of sale and warranty which may be varied only by alwritten agreement signed by a duly authorized representative of small no with COMMEN

in EPA Letter Dated: AUG 29 1988

EPA Registration 812 Under the Federal Insecticide Art of Funccide, and Rodenticide Art of Funccide, and Rodenticide Funccide, and Rodenticide Funccide, amended, for the Reg. No. amended under EPA Reg. No. registered under EPA Reg. No.

Shipping Data Packaging

1-and 5-gal container

 Shipping weight (approx.)
 1b
 kg

 1-gal unit
 16.9
 7.7

 5-gal unit
 79.7
 36.2

Shelf life when stored indoors at 40 to 100°F (4 to 38°C) 1 year from shipment date

Improper use and handling of this product can be hazardous to health and cause fire or explosion. Safety precautions with application instructions must be strictly followed during storage, handling, application and drying periods.

- Numerical values are subject to normal manufacturing tolerances, colors and testing variances.
- 2 Allow for application losses and surface irregularities.
- 3 See application instructions for complete information and safety precautions.

The directions for use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials or the manner of use or application, all of which are beyond Ameron's control. All such risks are assumed by Buyer.

## Limitation of Liability

Ameron's liability on any claim of any kind, including claims based upon Ameron's negligence or strict liability, for any 'oss or damage arising out of, connected with, or resulting from the use of the products, shall in no case exceed the purchase price allocable to the products or part thereof which give rise to the claim. In no event shall Ameron be liable for consequential or incidental damages.

201 North Berry Street Brea, California 92621 J. F. Kennedylaan 7 4191 MZ Geldermalsen, The Netherlands

(c) 1985 Ameron R10/86 supersedes R10/85 Printed in U.S.A.