

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



United States  
Environmental Protection  
Agency

Office of Pesticide Programs

CMP Coatings, Inc.  
1610 Engineers Road  
Bellechasse, LA 70037

AUG 26 2010

Attention: Chris Bridges  
Technical Manager

**Subject: TFA-10 A**  
EPA Registration No. 48302-7  
Amendment Dated May 6, 2010

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Revised Container Disposal Language per PR Notice 2007-4

General Comments

A stamped copy of the "accepted" label is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in black ink that reads "Marshall Swindell".

Marshall Swindell  
Product Manager 33  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)

Enclosure

# TFA-10 A

## Antifouling Paint for Commercial Use Only

to protect wood, fiberglass and/or metal vessels used in salt and fresh water  
All Season Long Protection Against Moderate to Heavy Fouling

Active Ingredient:

Cuprous Oxide.....	49.0%
Inert Ingredients.....	51.0%
Total.....	100.0%

Contains the toxic inert ingredient, Tri-orthocresylphosphate (TOCP)

### KEEP OUT OF REACH OF CHILDREN WARNING

SEE REAR LABEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

#### First Aid

- If swallowed:**
  - 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 on skin or clothing:**
  - 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 inhaled:**
  - 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 in eyes:**
  - 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.

Other: Have the product container or label with you when calling a poison control center or doctor or going for treatment.

Note to Physician: Contains petroleum distillate – vomiting may cause aspiration pneumonia.

EPA Registration No. 48302-7

EPA Establishment No. 48302-LA-001, 48302-CHN-001, 48302-CHN-002, 48302-MYS-001, 48302-KOR-001, 48302-JPN001, 48302-JPN-003, 48302-SGP-001 OR 48302-NLD-001

Manufactured By: CMP Coatings, Inc.  
A Chugoku Marine Paints Group Company

Weight 74.5 lbs. Per 5 Gallons

**ACCEPTED**  
with **COMMENTS**  
EPA Letter Dated:  
**AUG 26 2010**

**CMP Coatings, INC.**  
1610 Engineers Road, Belle Chasse, LA 70037  
U.S.A.

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. **48302-7**

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

Causes eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear protective clothing such as gloves, long-sleeved cotton shirt, long pants, and hat. May be fatal if swallowed or inhaled. Do not breathe spray mist. While spraying paint or sanding or sandblasting boat surfaces, wear a mask or a respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

**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 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 and 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 systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**CHEMICAL OR PHYSICAL HAZARD**

Flammable. Keep away from heat, sparks, or open flames.

**STORAGE AND DISPOSAL**

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

**Pesticide Disposal.** Pesticide wastes are toxic. Open dumping is prohibited. Pesticide, spray mixture or rinsate that cannot be used or chemically reprocessed should be disposed of according to procedures approved by Federal, State or local disposal authorities.

**CONTAINER DISPOSAL:** 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.

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### DIRECTIONS FOR USE

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

[Subset of directions for use in Heavy Duty Marine Market]

**Product Description:** TFA-10 A is an antifouling paint, with self-polishing action, suitable for application to wood, fiberglass, or metal vessels subject to attack by barnacles, algae, tubeworms, and other marine fouling organisms. It provides *season long protection of vessels with moderate to heavy fouling*. TFA-10 A may be used on vessels in salt, *brackish* and fresh waters. It is a very high performance antifouling paint for worldwide service with extended drydocking intervals up to 60 months. TFA-10 A uses a unique hydration mechanism during operation, resulting in long lasting antifouling protection. Not for sale to or use by the general public.

#### PRODUCT INFORMATION:

Finish/Sheen	Semi-Gloss
Volume Solids	55% at 23° C / 73° F
Film Thickness: (wet)	7.3 – 10.9 mils (182-274 microns)
(dry)	4.0 – 6.0 mils (100-150 microns)
Theoretical Coverage:	149-224 sq. ft./gal. Coverage varies with applied film thickness. Allow appropriate loss factors.

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48302-7

#### APPLICATION DETAILS:

Method:	Airless spray, brush or roller
Thinner:	Not recommended. If necessary to use, consult CMP Coatings for advice. [or] If necessary use RAVAX THINNER or consult CMP Coatings.
Cleaner:	RAVAX THINNER or xylene

#### Coating and Overcoating Interval

Drying Time (hrs) (DFT 4 mils) Substrate Temperature	Surface		Hard		Painting Interval		Dry to Launch*	
	Dry (hrs)	Hard (hrs)	Minimum (hrs)	Maximum (hrs)	Minimum (hrs)	Maximum (hrs)		
41° F (5° C)	3	12	12	24	12	24		
50° F (10° C)	2	8	8	18	8	18		
68° F (20° C)	1	5	6	12	6	12		
86° F (30° C)	½	4	5	10	5	10		

\* Contact your CMP Coatings representative for minimum drying time before flooding at higher dry film thicknesses.

#### REGULATORY DATA

VOC (EPA Rule 24) 3.34 lb/gal (400 g/l) as supplied.

[Continued subset of directions for use in Heavy Duty Marine Market]

**SYSTEMS AND COMPATIBILITY:** CMP Coatings should be consulted for application advice, specification recommendations and the suitability of specific products on individual vessels.

**APPLICATION METHOD and LIMITATIONS:** Apply **TFA-10 A** by spray, brush or roller. It may be used over suitable existing coatings. Preferable undercoatings are: RAVAX AC, RAVAX AC-P, SILVAX SQ-HB, UMEGUARD MP or contact CMP Coatings.

Airless spray is strongly recommended, if spray is chosen. A minimum of two coats is recommended. See chart on minimum drying times.

Apply in good weather when air and surface temperature are above 41° F (5° C) with humidity <85% RH. Surface temperature must be at least 5° F (3° C) above dew point. For optimum application conditions, bring material to 70-80° F (21-27° C) before mixing and application. Unmixed material (in closed containers) should be maintained in protected storage between 35 and 95° F (2-38° C) with a minimum of 32° F (0° C).

Apply 7.3 – 10.9 mils (182-273 microns) wet film thickness to yield about 4.0 – 6.0 mils (100 – 150 microns) dry film thickness. Consult the following equipment recommendations or use a suitable equivalent. For airless spray, use Tip No. Graco 619, 721; paint output pressure of 120 – 150 kg/cm<sup>2</sup> (1700 – 2100 psi); and viscosity of 40 sec. (Ford Cup No. 4). For brush or roller application consult the equipment recommendations or use suitable equal:

**Equipment**

- Brush: Use appropriate size China bristle brush
- Roller: Use All Purpose Roller cover 3/8" (9.5 mm) pile smooth to medium.
- Prewash roller cover to remove loose fibers before use.

**Surface Preparation:** Paint only clean, dry surfaces. Remove all dirt, grease, oil, soluble contaminants and other detrimental "foreign" material by cleaning. For unpainted surfaces, prepare surface and apply recommended primer, according to manufacturer's specifications. Apply one or more coats of the primer as specified. For new construction: dependent on yard procedures, consult CMP Coatings. A suitable anticorrosive coating should be applied to metals. Repair corroded areas with the recommended anticorrosive primer. A primer is recommended for wood or fiberglass before applying this product. For painted surfaces, surface must be dry, clean, free from rust, grease and loose paint. For maintenance, the substrate must be high pressure washed to remove salt and fouling.

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[Continued subset of directions for use in Heavy Duty Marine Market]

Recoating and Upgrading of approved systems. Use controlled close high pressure fresh water washing (3,000 psi, 211 kg/sq/cm) to clean the entire area and remove any leached layer at the surface of the existing antifouling system. Repair corroded areas with the recommended anticorrosive primer and apply a spot coat of this product within the overcoating interval specified for the primer (consult relevant primer data sheet).

MIXING: This material is one-component coating. Always stir paint thoroughly with a power agitator before application.

THINNING: Paint is formulated at spray viscosity and normally does not need to be thinned. If thinning is necessary, thin up to a maximum of 5% (by volume) with a recognized paint thinner such as RAVAX THINNER or seek assistance from CMP Coatings. Do not thin beyond your State's compliancy.

CLEANUP and WORK STOPPAGES: Clean all equipment immediately after use with RAVAX THINNER or xylene. Spray equipment must be flushed with this solvent. Periodically flush-out spray equipment during the working day. Frequency of cleaning/flushing will depend on such factors as amount sprayed, temperature and elapsed time including breaks. Continuously monitor the condition of the equipment.

Shelf Life and Storage: Store product in cool, dry well-ventilated area. Keep container closed and upright when not in use to prevent leakage. Shelf life is 12 months in this condition.

SAFETY: Prior to use, obtain, consult and follow the Material Safety Data Sheet for this product for added details concerning both product and health and safety information. Read and follow all precautionary notices on the Material Safety Data Sheet and this container label. If you do not fully understand these warnings and instructions or if you cannot strictly comply with them, do not use this product. Proper ventilation and protective measures must be provided during application and drying to keep solvent vapor concentrations within safe limits and to protect against toxic or oxygen deficient hazards and/or flash fire. Actual safety measures are dependent on application methods and work environment. This safety information is not a substitute for that contained in the Material Safety and Product Data Sheets.

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[Subset of directions for use in The Yacht Market]

**Product Description:** TFA-10 A is an antifouling paint suitable for application to wood, fiberglass, or metal vessels subject to attack by barnacles, algae, tubeworms, and other marine fouling organisms. It provides season long protection of vessels with moderate to heavy fouling. TFA-10 A may be used on vessels in salt, brackish and fresh waters. It is a very high performance antifouling paint for worldwide service with extended drydocking intervals up to 60 months. Not for sale to or use by the general public.

**Compatibility:** This product can be applied over existing antifouling coatings so long as the old coating adheres tightly and is in good condition. Before applying over conventional antifouling paints, sand thoroughly with 80 grit wet-or-dry sandpaper. Remove soft rosin based coatings before applying this product.

**Coats required:** 2 coats. On bare wood, two coats over primer.

**Thinner:** RAVAX THINNER

**Thinning:** Thin only if necessary. Do not exceed 5% by volume.

**Drying Times at 68° F [20° C]:** Touch dry: 1 hour  
To Recoat: 6 hours  
To Launch: Minimum, 6 hours  
Maximum, 12 hours

**Clean Up:** RAVAX THINNER or xylene

**Theoretical Coverage:** 149 – 224 sq.ft/gal.

**Application Temperatures:** 41° F (5° C) and above

**APPLICATION SYSTEMS FOR YACHTS**

**APPLICATION METHOD and LIMITATIONS:** Apply TFA-10 A by brush or roller. It may be used over suitable existing coatings. Preferable undercoatings are: RAVAX AC, RAVAX AC-P, SILVAX SQ-HB, UMEGUARD MP or contact CMP Coatings.

TFA-10 A may be applied as two coats, preferably. Drying time between coats, and before launching vary with film thickness, temperature, humidity; the above are general estimates.

Apply in good weather when air and surface temperature are above 41° F (5° C) with humidity <85% RH. Surface temperature must be at least 5° F (3° C) above dew point. For optimum application conditions, bring material to 70-80° F (21 - 27° C) before mixing and application. Unmixed material (in closed containers) should be maintained in protected storage between 35° and 95° F (2° - 38° C) with a minimum of 32° F (0° C).

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[Continued subset of directions for use in The Yacht Market]

Apply 7.3 – 10.9 mils (182 – 273 microns) wet film thickness to yield about 4.0 – 6.0 mils (100 – 150 microns) dry film thickness. Consult the following equipment recommendations or use a suitable equivalent. For brush or roller application consult the equipment recommendations or use suitable equivalent.

For Brush: Use appropriate size China bristle brush

For Roller: Use All Purpose Roller Cover 3/8" (9.5mm) pile smooth to medium.

Prewash roller cover to remove loose fibers before use.

Surface Preparation: Paint only clean, dry surfaces that are free from rust, grease and loose paint. Remove all dirt, grease, oil, soluble contaminants and other detrimental "foreign" material by cleaning. For unpainted wood or fiberglass surfaces, prepare surface and apply recommended primer, according to manufacturer's specifications. Apply one or more coats of the primer as specified. For new construction: dependent on yard procedures, consult CMP Coatings. For metal surfaces apply a suitable anticorrosive coating to metals. Repair corroded areas with the recommended anticorrosive primer. A primer is recommended for wood or fiberglass before applying this product. For painted surfaces, surfaces must be dry, clean, free from rust, grease and loose paint. For maintenance, the substrate must be high pressure washed to remove salt and fouling.

Recoating and Upgrading of approved systems. Use controlled close high pressure fresh water washing (3,000 psi, 211 kg/sq/cm) to clean the entire area and remove any leached layer at the surface of the existing antifouling system. Repair corroded areas with the recommended anticorrosive primer and apply a spot coat of this product within the overcoating interval specified for the primer (consult relevant primer data sheet).

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[Continued subset of directions for use in The Yacht Market]

Shelf Life and Storage: Store product in cool, dry well-ventilated area. Keep container closed and upright when not in use to prevent leakage. Shelf life is 12 months in this condition.

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