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51647-2

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 25 1996

Rappahannock Coatings Inc.
1200 George Wood Drive
Elizabeth City, NC 27909

Attention: Fred H. Porter
Vice President and Technical Director

Subject: COPPER PAINT NO. 2 RED
EPA Registration No. 51647-2
Your Amendment Dated March 12, 1996
EPA Received Date March 14, 1996

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to further clarify and expand the product use sites on the labeling, is acceptable.

The Agency has reviewed the submitted labeling sent in response to the State of Florida Pesticide Registration Division's request for clarification and subsequent EPA acceptance of intended uses. The revised labeling which specifies use of this antifoulant product for "boats" and "barges" and includes as new uses, "crab pots" and "lobster pots", is acceptable. It was determined that these expanded use patterns are consistent with the aquatic, non-food, antifoulant use profile previously established by the Agency for Cuprous Oxide product formulations.

Please make the following labeling revisions before you release the product for shipment bearing the amended labeling:

1. The "STATEMENT OF PRACTICAL TREATMENT" typeface should be identical to the "IF SWALLOWED" text below it (i.e., Use a slightly larger type size, printed in all capital letters.).

2. On the front panel, update the "IF SWALLOWED" sentence to read "Drink promptly a large quantity of water.".

3. On the back panel, above the "STORAGE AND DISPOSAL" section, delete the "DIRECTIONS FOR USE" header and the "It Is A Violation Of Federal Law To Use This Product In A Manner Inconsistent With Its Labeling." statement.

CONCURRENCES							
SYMBOL	7503C						
SURNAME	David						
DATE	6/25/96						

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4. Delete the header "DESCRIPTION & APPLICATION" and replace it with the "DIRECTIONS FOR USE" header and the "It Is A Violation Of Federal Law To Use This Product In A Manner Inconsistent With Its Labeling." statement.

5. Under the "STORAGE AND DISPOSAL" header replace the disposal statements with the following:

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.

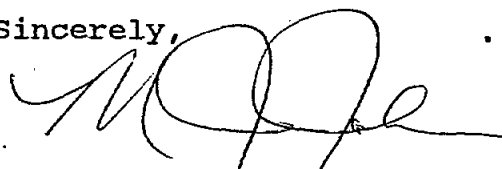
CONTAINER DISPOSAL - Dispose of container by triple rinse (or equivalent) and recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures. If burned stay out of smoke.

A stamped copy of the COPPER PAINT NO. 2 RED product labeling is enclosed for your records. Submit one (1) copy of the revised final printed labeling before you release the product for shipment.

Please note that the primary product of record under EPA Registration No. 51647-2, is the "Red" paint formulation. The additional labeling submitted under this amendment for the "Black" paint product will not be reviewed or stamped since it represents an alternate formulation (secondary product) under this registration.

If you have any questions concerning this letter, please contact Doreen Aviado of my staff at (703) 305-6554.

Sincerely,



Marion J. Johnson, Jr.
Product Manager (31)
Antimicrobial Program Branch
Registration Division (7505C)

Enclosure

cc: Tom Shackelford, C.E.O.
Rappahannock Coatings Inc.

73/8 95-922 BUK
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HIGH PERFORMANCE MARINE FINISHES

RAPPAHANNOCK

COATINGS, INC.

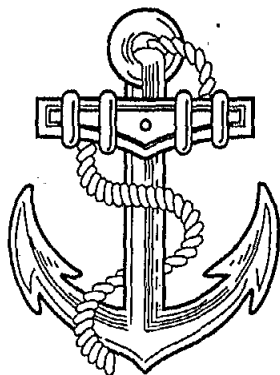
95-922 RED
1/13/95

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 25 1996

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

51647-2



ANTI-FOULING BOAT BOTTOM COPPER PAINT No. 2

Red

ACTIVE INGREDIENTS - (All Colors)

CUPROUS OXIDE24.53%

(Copper as Metallic 21.73%)

INERT INGREDIENTS75.47%

TOTAL100.00%

This Product Contains Petroleum Distillates

WARNING - Keep Out Of Reach Of Children

Statement of Practical Treatment (First Aid)

IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid Alcohol. Get Medical Attention. IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get Medical Attention. IF ON SKIN: Wash with plenty of soap and water. If irritation persists, Get Medical Attention. IF IN EYES: Flush with plenty of water for at least 15 minutes. Get Medical Attention.

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SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ONE GALLON

WARNING! COMBUSTIBLE. HARMFUL OR FATAL IF SWALLOWED.
See CAUTIONS elsewhere on label.

ANTI-FOULING COPPER PAINT

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

WARNING

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. Do not breathe vapor or spray mist while spraying paint or sanding boat surface. Wear a mask or respirator jointly approved by the Mining Enforcement and Safety Administration and The National Institute of 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.

PHYSICAL or CHEMICAL HAZARDS

Do Not Use or Store Near An Open Flame

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Store in a cool, dry area away from heat or open flame.

DISPOSAL

Pesticide spray mixture or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

Container - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

DESCRIPTION & APPLICATION

This is a cuprous oxide pigmented coating, formulated especially to prevent the attachment of both plant and animal fouling on boats, barges, crab pots, lobster pots, and vessels immersed in sea water and "brackish" water.

When used over steel or aluminum surfaces, a primer coating is required to prevent accelerated corrosion. This coating requires no primer when used directly over fiberglass or wood. For optimum performance, two (2) coats are recommended. The theoretical coverage of this product is at least 400 sq. feet per gallon when applied to the recommended dry film thickness.

To prepare the surface for coating, remove all old coating and fouling residue by either washing with high pressure water, scraping or by disc sanding. Be sure to use the proper protective equipment to prevent inhalation or ingestion of the paint dust generated.

A clean dry surface, free of scale, corrosion, dirt, grease, oil, marine fouling, or other foreign matter will provide the optimum performance of this coating when used for either complete coating or touch-up. Inadequate surface preparation will result in unsatisfactory performance. Be sure to remove all dust, debris and other surface contaminants that are generated by the cleaning process prior to painting.

Mix the coating with either a high speed mixer or a paint shaker for a minimum of five (5) minutes to insure complete pigment reincorporation. Thin in the event that the coating is too thick to apply easily. Thin with mineral spirits or VM&P Naphtha.

Apply by either brush, roller or spray. Be sure to follow mixing instructions and apply the correct film thickness. Allow a minimum of four (4) hours between coats and a minimum of two (2) hours before undocking vessel.

ACCEPTED
with COMMENTS
in EPA Label Draft

JUN 25 1996

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

51647-2

Manufactured By:

**Rappahannock
Coatings, Inc.**

Elizabeth City, NC 27909
Establishment No. 51647-NC-02

Lodi, NJ 07644

Establishment No. 32259-NJ-1

EPA Registration No. 51647-2

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Rappahannock Coatings, Inc.
Elizabeth City, NC 27909 • Lodi, NJ 07644