JUL 2 1 1999

PROTECTION AGENCY

Kop-Coat, Inc. 436 Seventh Avenue Pittsburgh, PA. 15219-1818

Attention: Alan S, Ross Vice President

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Subject: Pettit Marine Paint Antifouling Yacht Copper Paint 1636 Red EPA Registration No. 60061-44 Your Amendment Dated June 21, 1999

UNITED STATES ENVIRONMEN

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to make changes to the Precautionary Statement, First Aid Statements, Directions for Use, Storage Instructions and to add a Warranty Statement, and a Medical Emergency Number is acceptable provided that you make the following label changes:

1. Revise your Precautionary Statements to read:

WARNING: Harmful if swallowed, if absorbed through the skin or if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Causes substantial but temporary eye injury. Wear protective clothing such as gloves, longsleeved cotton shirt, long pants, and hat. Avoid breathing spray mist. While spraying paint or sanding or sand blasting boat surfaces, wear a mask or a respirator jointly approved by the Mining Safety & Health Administration and the National Institute of Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. May pose an aspiration pneumonia hazard.

2. Delete the phrase "Prop 65 Warning deleted".

A stamped copy is enclosed for your records.

CONCURRENCES			
SYMBOL			
SURNAME			
DATE			
EPA Form 1320-1A (1/90)		OFFICIAL FILE COPY	

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If you have any questions concerning this letter, please contact Pam Hasty at (703) 308-7933.

Sincerely,

Marshall Swindell

Product Manager 33 Regulatory Management Branch I Antimicrobials Division (7510C)



ACCEPTED with COMMENTS in EPA Letter Dated:

JUL 2 1 1999

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

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60061-44

ANTIFOULING YACHT COPPER PAINT 1636 RED

1 GALLON (3.785 LITERS)

50-444

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

ACTIVE INGREDIENTS:

Coprous Oxide	25.0%
OTHER INGREDIENTS	75.0%
	100.00%
COPPER AT METALLIC	22.2%

. EX Reg.No 60061-44

EX Est. No 60061-NJ-2

This product contains petroleum distillates.





PRECAUTIONARY STATEMENT HAZARD HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed, if absorbed through the skin or if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Causes substantial but temporary eye injury. Wear protective eye wear, goggles or safety glasses. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling.

FIRST AID: If Swallowed: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol. If On Skin: Wash with plenty of soap and water. Get medical attention. If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention. If In Eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS: Combustible. Do not use or store near heat or 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: Do not contaminate water, food, or feed by storage and disposal.

Pesticide Storage: Store this product in its originally labeled container in a storage area located in a cool place. **Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

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

YACHT COPPER PAINT

PRODUCT DESCRIPTION: Due to its free teaching and easy chalking properties, Yacht Copper Paint is basically used on slower moving craft and in cool waters where modest fouling prevails. Yacht Copper Paint is seasonal control and is ideal for workboats, commercial fisherman and general boat yard use when good yet economical protection is desired. Although originally developed for wooden boats, Yacht Copper also permits easy application to properly prepared fiberglass, steel and previously applied coalings. By leaching and washing away paint buildup from year to year will be very slight and the surface can be easily cleaned. COMPATIBILITY: Yacht Copper Paint may be applied over most aged hard antifouling coatings. Oid soft antifouling paints must be completely removed before applying Yacht Copper Paint. MIXING: Yacht Copper Paint contains cuprous oxide. As a result, there is a tendency for settling to occur especially if the paint has been on the shelf for several months. It is necessary to thoroughly mix the paint before using. If possible shake the can of paint on a mechanical paint shaker. Before using check the sides and bottom of the can to make sure all the pigment has been mixed in. If mixing is going to be done with a wooden paddle or an electric drill mixer, pour off halt of the liquid from the top of the can into another can and then properly mix in any settled pigment, then remix the two parts together thoroughly.

APPLICATION TEMPERATURE: 40 - 90°F.

APPLICATION METHOD: Brush, roller or spray.

THINNER: Thinning is not normally required. If necessary, use Petiti 12120 Brushing Thinner for brush and roller applications, or Petiti 12121 Spraying Thinner for spray applications. In either case, do not thin more 5% by volume. Use Pettit 12120 Brushing Thinner to remove sanding residue and to clean equipment. :RAGE: Yacht Copper Paint covers approximately 400 square feet per gallon.

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5:	To recoat	To launch
90°F	8 hours	6 hours
70° F	16 hours	12 hours
50°F	24 hours	24 hours

The above dry times are minimums. Maximum time before launch is 48 hours @ 70°F. If the boat is hauled during the season, Yacht Copper will loose its effectiveness if left out of water longer than three (3) days. **VOC:** Less than 330 g/l unthinned.

PAINT SYSTEMS: The paint systems outlined below contain references to other Pettit products. Please read and understand the tabel and/or Technical Bulletin for these products as well as to ensure that they are used properly. For further guidance, please contact your local Pettit salesman or the Pettit Customer Service Department at (800) 221-4466 between the hours of 8:30 a.m. and 4:30 p.m. EST.

PREVIOUSLY PAINTED SURFACES: If the previous coating is in good condition, thoroughly sand with 80-120 grit production paper and wipe clean with a rag dampened with Pettil 12120 Brushing Thinner to remove sanding residue. Apply two coats of Yacht Copper Paint observing the proper dry times. If the previous coating is in poor condition, remove to the bare surface by sanding or using paint and varnish remover. Proceed with the appropriate bare system as described below. Old this copplymer paints must be removed or may be seated with Pettil 6627 Tie Coat Primer before applying Yacht Copper Paint.

BARE FIBERGLASS: All bare fiberglass, regardless of age, must be thoroughly cleaned using Pettit 15095 Fiberglass Dewaxer and clean lint-free rags. Several cleanings may be necessary to ensure complete removal of contaminants. Change rags frequently during the dewaxing/cleaning process to ensure complete removal of contaminants rather than merely smearing them on the surface. New boats must be scrubbed with a detergent and water solution and rinsed with fresh water prior to dewaxing. After the surface has been dewaxed, sand it thoroughly with 80 grit production paper and rewash the sanded surfaces with Pettil 15095 Dewaxer or 12120 Brushing Thinner to remove sanding residue. Apply two coats of Yacht Copper Paint observing the proper dry times.

It sanding is prohibited, as with certain vinyl-ester gelcoats, or is otherwise impractical, make sure the surface has been completely and thoroughly dewaxed and cleaned with Petiti 15095 Fiberglass Dewaxer. Then apply one thin continuous coat of Petiti 6999 Sandless Primer. Topcoat with two coats of Yacht Copper Paint carefully following the topcoating instructions on the Sandless Primer label.

If the gelcoat is crazed or "spider-cracked," sand the gelcoat with 80-120 grit paper to a dull, frosty finish; wipe clean with Petiti 12120 Brushing Trinner. Follow with a coat of 4777/4778 High Build Epoxy Primer; allow to dry overnight, sand with 80 grit paper and solvent clean before the application of Yacht Cooper Paint.

BARE WOOD: Sand the entire surface with 80 grit production paper and wipe clean with a rag dampened with Petiti 12120 Brushing Thinner. Apply a coat of Yacht Copper Paint thinned 25% with the 12120 Brushing Thinner to penetrate and seal the wood. Fiil any open seams with Petiti Seam Compound (7110 White or 7610 Mahogany) and allow to dry overnight. Apply two full coats of Yacht Copper Paint observing the proper dry times.

STEEL HULL, UNDERWATER METAL PARTS AND KEELS: For steel hulls and metal keels, consult Petiti Technical Bulletin TB430 High Build Epoxy Primer for complete priming instructions or consult the Petiti Technical Department or your local Petiti representative. For underwater metal parts, consult Technical Bulletin TB112 Underwater Running Gear Painting Specification for complete priming and application details.

MAINTENANCE OF ANTIFOULING PAINT: No antifouling paint can be effective under all conditions of exposure. Man-made pollution and natural occurrences can adversely affect antifouling paint performance. Extreme hot and cold water temperatures, sill, dirt, oil, brackish water and even electrolysis can ruin an antifouling paint. Therefore, we strongly suggest that the bottom of the boat be checked regularly to make sure it is clean and that no growth is occurring. Lightly scrub the bottom with a soft brush to remove anything from the antifouling paint surface.

WARRANTY: We guarantee this material to comply with our published specifications. Since the use of this material is beyond our control, we disclaim responsibility for its handling, use, storage, the results obtained or any injury or damage of any nature resulting therein.

Manufactured by Kop-Coat, Inc., Pettit Division, Rockawyy, NJ 07366

MEDICAL EMERGENCIES 1-800-548-0489