

PM 33

60061-50

11/8/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 08 1999

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

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

Attention: Alan S. Ross

Subject: Pettit Marine Paint Trinidad Antifouling 1675 Red
EPA Registration Number 60061-50
Your Submission Dated October 1, 1999
EPA Received Date October 4, 1999

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to revise the Precautionary Statements and Directions for Use sections, is acceptable.

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

However at the next printing of your labeling, please make the following revisions:

Revise the *Environmental Hazards* section.

Delete the phrase egg *whites* and *milk* from the product labeling.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

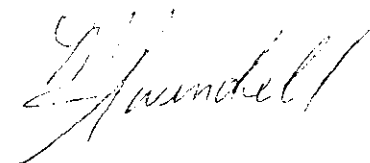
A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division (7505C)

NOV 08 1999

Revise your Environmental Hazards statement to read:

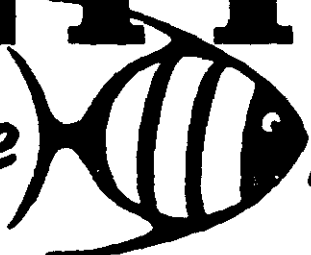
"This pesticide is toxic to aquatic organisms including fish and shellfish. Do not apply directly to water by cleaning of equipment or disposal of wastes. Do not allow chips and dust generated during paint removal to enter water. Dispose of paint debris in an approved landfill."

A handwritten signature in cursive script, appearing to read "J. J. J. J.", is written in dark ink.

345

PETTIT

marine



paint

TRINIDAD

ANTI FOULING

1675 RED

COMMERCIAL AND PRIVATE CONSUMER USE
KEEP OUT OF REACH OF CHILDREN.

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

ACTIVE INGREDIENT:	
Cuprous Oxide	75.80%
INERT INGREDIENTS	24.20%
	100.00%
COPPER AS METALLIC	67.3%

EPA Reg. No. 60061-50
EPA EST. NO. 60061-NJ-2

This product contains
petroleum distillates.

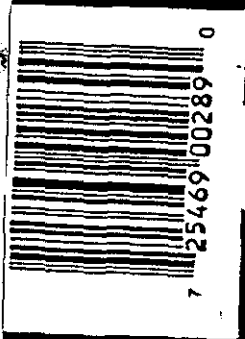
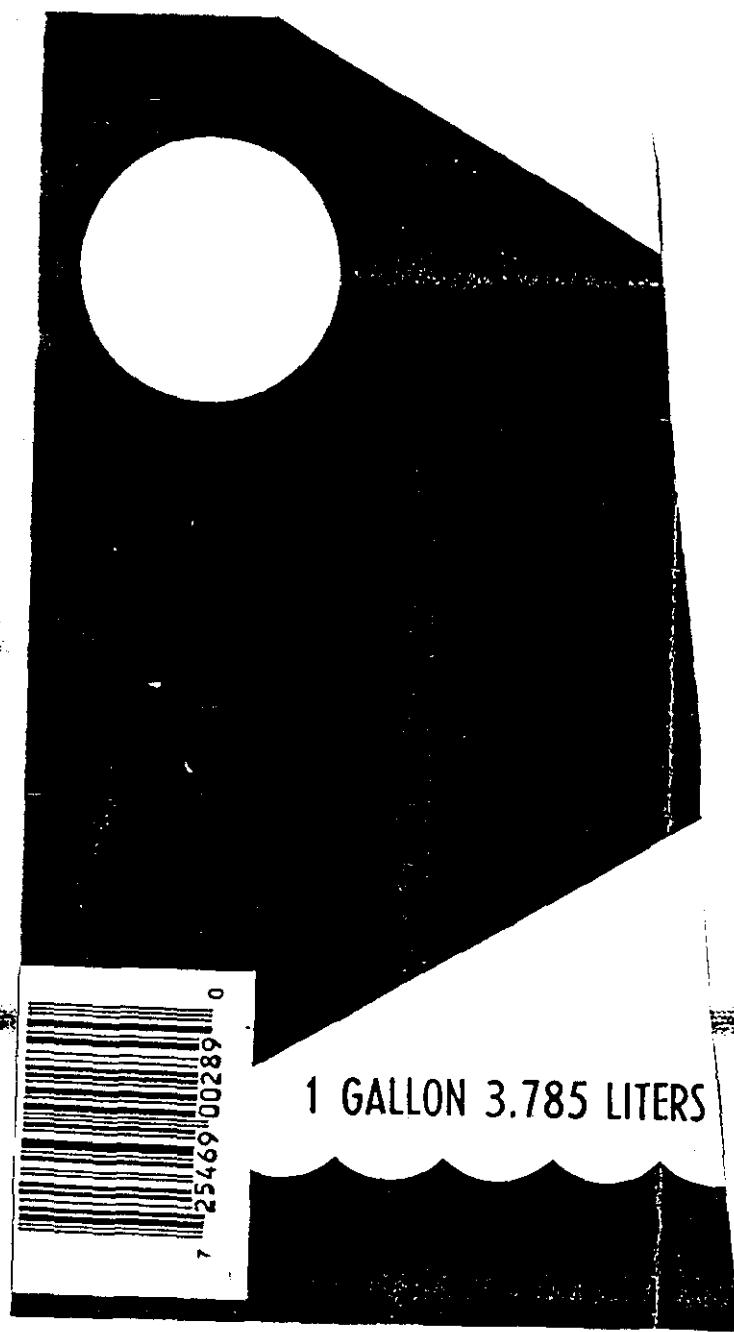
ACCEPTED
with COMMENTS
in EPA Letter Dated:

NOV 08 1999

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

60061-50

4 8 5



1 GALLON 3.785 LITERS

595

TRINIDAD

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes moderate 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 vapors, spray mist or sanding dust. Wear a NIOSH-certified mask or pesticide respirator. Remove contaminated clothing and wash 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 or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol.
IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.
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.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

PHYSICAL OR CHEMICAL HAZARDS: Combustible! Do not use or store near heat or open flame.

STORAGE & DISPOSAL: Do not contaminate water, food, or feed by storage or disposal.

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 use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative of the nearest EPA Regional Office for guidance.

PESTICIDE STORAGE: Store this product in its originally labeled container in a storage area located in a cool place. Keep container tightly closed when not in use.

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.

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

NOTE: When product is used in confined areas or applied by spraying, wear a respirator jointly approved by the Mining Enforcement and Safety Administration (formerly the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provision of 42 CFR Part 84.

Product Description: Trinidad is a top-of-the-line hard modified epoxy antifouling paint for use on boat bottoms. Designed to repel fouling in the most severe fouling tropical waters, Trinidad can be used equally successfully in temperate waters as well as fresh water. Trinidad may be applied on fiberglass, wood, or properly primed steel boats. Trinidad is ideal for both power and sail boats, anywhere a durable finish and long lasting performance is desired.

Compatibility: Trinidad may be applied over most aged hard antifouling coatings. Old soft antifouling paints must be completely removed before applying Trinidad. Old tin copolymers must be removed completely or sealed with Pettit 6627 The Coat Primer before applying Trinidad.

Mixing: Trinidad is heavily loaded with cuprous oxide. As a result of this loading 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 half of the liquid from the top of the can into another can and then properly mix in any settled pigments, then remix the two parts together thoroughly.

Application Temperature: 50°F and above.

Application Method: Brush, roller or spray.

Thinner: Thinning Trinidad is not normally required. If necessary, use Pettit 12120 Brushing Thinner for brush and roller applications, or Pettit 12121 Spraying Thinner for spray applications. In either case, do not thin more than 5% by volume.

Coverage: Trinidad covers approximately 400 square feet per gallon.

Number of Coats: Two full coats of Trinidad are recommended for best antifouling protection.

Dry Times:

90°F
70°F
50°F

To recoat
2 hours
4 hours
6 hours

To launch
8 hours
16 hours
24 hours

The above dry times are minimums. Trinidad may be recoated after the minimum times shown and launched up to 60 days after painting.

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, silt, 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. The self-cleaning nature of the coating is most effective when the boat is used periodically.

VOC: Less than 375 g/l unthinned. Less than 400 g/l thinned.

PAINT SYSTEMS

The paint systems outlined below contain references to other Pettit products. Please read and understand the label and/or Technical Bulletin for these products as well 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 grit production paper and wipe clean with a rag dampened with Pettit 12120 Brushing Thinner to remove sanding residue. Apply two coats of Trinidad observing the proper dry times. If the previous coating is soft or 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 tin copolymer paints must be removed or may be sealed with Pettit 6627 The Coat Primer before applying Trinidad.

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 Pettit 15095 Dewaxer or 12120 Brushing Thinner to remove sanding residue. Apply two coats of Trinidad observing the proper dry times.

If 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 Pettit 15095 Fiberglass Dewaxer. Then apply one thin continuous coat of Pettit 6999 Sandless Primer. Topcoat with two coats of Trinidad carefully following the topcoating instructions on the Sandless Primer label.

Bare Wood: Sand the entire surface with 80 grit production paper and wipe clean with a rag dampened with Pettit 12120 Brushing Thinner. Apply a coat of Trinidad thinned 5% with the 12120 Brushing Thinner to penetrate and seal the wood. Fill any open seams with Pettit Seam Compound (7110 White or 7610 Mahogany) and allow to dry overnight. Apply two full coats of Trinidad observing the proper dry times.

Steel Hulls, Underwater Metal Parts and Keels: For steel hulls and metal keels, consult Pettit Technical Bulletin TB430 High Build Epoxy Primer for complete priming instructions or consult the Pettit Technical Department or your local Pettit representative. For underwater metal parts, consult Technical Bulletin TB112 Underwater Running Gear Painting Specification for complete priming and application details.

DO NOT USE THIS PRODUCT ON ALUMINUM HULLS OR OUTDRIVES

DISCLAIMER: The performance of any marine paint or coating depends on many factors outside the control of Pettit Paint Company, including surface preparation, proper application and environmental conditions. Therefore, Pettit Paint Company cannot guarantee this product's suitability for your particular purpose or application. Implied warranties of fitness for a particular purpose and of merchantability are excluded. Pettit Paint Company shall not under any circumstances be liable for incidental or consequential damages. By purchase or use of this product, buyer agrees that the sole and exclusive remedy, if any, is limited to the refund of the purchase price or replacement of the product at Pettit Paint's option.

MEDICAL EMERGENCIES: 1-800-548-0489