



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 1, 2019

Sandy Lea  
Pesticide Registrar  
Kop-Coat, Inc.  
36 Pine Street  
Rockaway, NJ 07866

Subject: Notification per PRN 98-10 – Modify marketing claims and correct typos  
Product Name: PETTIT MARINE PAINT UNEPOXY TIN-FREE  
ANTIFOULING 1628 RED FOR TEMPERATE WATERS  
EPA Registration Number: 60061-64  
Application Date: October 8, 2019  
Decision Number: 556430

Dear Mr. Lea:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Joseph Daniels at (703) 347-8669 or via email at [Daniels.joseph@epa.gov](mailto:Daniels.joseph@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "E. Miederhoff".

Eric Miederhoff  
Product Manager 31  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs



## NOTIFICATION

60061-64

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/01/2019

DISCLAIMER: The performance of any marine paint or coating depends on many factors outside the control of Pettit Paint Company ("Pettit"), including surface preparation, proper application and environmental conditions. Therefore, Pettit cannot guarantee this product's suitability for your particular purpose of application. To the extent consistent with applicable law, Pettit EXPRESSLY DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES, INCLUDING, WITHOUT LIMITATION, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE or otherwise that extend beyond the statements made on this label, and shall not be liable for special, incidental, or consequential damages resulting from the use or handling of this product, the exclusive remedy being the replacement of this product or refund of the purchase price of the product, at Pettit's sole discretion. To the extent consistent with applicable law, buyer/use assumes all risk of possession, handling, or use this material when use and/or handling is contrary to label instructions.

# UNEPOXY TIN-FREE ANTIFOULING 1628 RED FOR TEMPERATE WATERS

- Fast dry formula
- **Fast dry**
- High copper load / content
- Hard durable finish
- Designed for extreme fouling conditions
- Excellent adhesion to fiberglass, wood, and steel hulls
- Economical Antifouling Protection
- Hard Smooth Finish
- Apply Over Most other Antifouling
- High-copper hybrid protection
- Smooth durable polishing finish
- Self-polishing paint keeps running surface smooth and clean, preventing **build up**
- Haul and re-launch without losing effectiveness
- Long lasting polishing finish

### ACTIVE INGREDIENTS:

Cuprous Oxide\* (CAS# 1317-39-1) 53.30%

**INERT INGREDIENTS:** 46.70%

Total 100.00%

\*Metallic copper equivalent 47.33%

Contains petroleum distillates, xylene or xylene range aromatic solvents.

[1228 Blue, 1328 Green, 1628 Red, 1828 Black] [B-91 Blue, B-93 Green, B-90 Red, B-94 Black] [1046 Red] [4601 Black, 4602 Blue] [BP-94 Black, BP-91 Blue, BP-90 Red, BP-93 Green]

NON-COMMERCIAL USE  
KEEP OUT OF REACH OF CHILDREN  
WARNING

NET CONTENTS  
1 GAL. (128 FL. OZ.)  
3.785 LITERS

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

EPA EST. NO. 60061-NJ-2  
EPA REGISTRATION NO. 60061-64

KOP-COAT, INC.  
36 PINE STREET  
ROCKAWAY, NJ 07866

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

**WARNING:** May be fatal if swallowed or inhaled. Harmful if absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Do not breathe vapors, spray mist or sanding dust Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**Personal Protective Equipment (PPE):** Mixers, loaders, applicators and other handlers must wear the following: Protective eyewear, chemical resistant gloves such as Nitrile Rubber Gloves greater than 14 mils thick, long sleeved shirt, long pants and shoes plussocks.

While removing existing paint by sanding or blasting, or applying new antifoulant paint, users must wear a minimum of a NIOSH-approved elastomeric half mask respirator with organic vapor (OV) cartridges and a combination N, R or P filter; OR a NIOSH-approved gas mask with OV canisters; OR a NIOSH-approved powered air-purifying respirator with OV cartridges and combination HE filters. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

**USER SAFETY RECOMMENDATIONS**

Users should wash hands before eating drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing. Wash the outside of gloves before removing.

**ENVIRONMENTAL HAZARDS**

This material is toxic to fish and aquatic invertebrates. 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact you State Water Board or Regional Office of the EPA.

**PHYSICAL OR CHEMICAL HAZARDS: COMBUSTIBLE.** Do not use near heat or open flame. Use only with adequate ventilation during mixing, application and drying. Use absorbent clean-up material if spilled. For fires, blanket flames with foam, CO<sub>2</sub> or dry chemical. Wear NIOSH certified breathing equipment.

**FIRST AID**

<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>Do not give anything by mouth to an unconscious person.</li> <li>Do not give any liquid to the person.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Call a poison control center or doctor immediately for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>Move person to fresh air.</li> <li>Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-548-0489 for emergency medical treatment information.

**NOTE TO PHYSICIAN**

Contains petroleum distillate. Vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

**STORAGE & DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

**Pesticide Storage:** Store in a closed, properly labeled container in a cool place. Keep closures tight and upright to prevent leakage. Keep container closed when not in use. In case of spillage, absorb and dispose of in accordance with local applicable regulations.

**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 at the nearest EPA Regional Office for guidance.

**Container Handling:** Non-refillable 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.

**DIRECTIONS FOR USE**

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

**Product Description:** This product is a hard protective antifouling coating resistant to algae, barnacles and other marine and freshwater fouling organisms for use on boat bottoms. It may be applied over most aged hard antifouling coatings. Old soft antifouling paints should be removed for best adhesion. It may be applied on fiberglass boats with outboards or outdrives with no danger of electrolysis, provided the drive units are not coated themselves. This product is also suitable for all non-aluminum trailered boats.

**Surface Preparation:** The surface to be painted should be dry, clean and free of any contaminants. It should be properly prepared by solvent cleaning and sanding before any primers or paints are applied. Follow the recommended systems below. When sanding old antifouling paint, always wear Personal Protective Equipment (PPE) as described above to prevent the inhalation of sanding dust.

**Preparation of Paint:** This product 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 pigment, then remix the two parts together thoroughly.

**Application Temperatures:** 40°F to 90°F.

**Application Method:** Brush, roller or spray.

**Thinner:** Thinning this product is not normally required. If thinning is necessary, use [Pettit 120 Brushing / Thinner]. For a smoother finish on especially warm and breezy days. Use [Pettit 121 Spraying / Thinner] for spray application. Do not thin more than 10% by volume (12 ounces per gallon), or inadequate paint film thickness may result in premature erosion of the finish. Use either thinners for clean-up.

**Coverage:** This product covers approximately 400 square feet per gallon when applied at 2 dry mils film thickness. **Number of Coats:** Two coats should be applied for best antifouling protection. Do not apply this product if rain or dew is expected before the surface has dried completely.

<b>Dry Times:</b>	To recoat	To launch
90°F	2 hours	8 hours
70°F	4 hours	16 hours
50°F	6 hours	24 hours

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

**VOC:** Equal to or less than 330 g/l as supplied and applied.

**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, other than slime is occurring. Lightly wipe the bottom with a rag to remove anything from the antifouling paint surface. Wiping is particularly important with boats that are idle for extended periods of time. The coating is most effective when the boat is used periodically. The self-cleaning nature of the coating is most effective when the boat is used periodically. Boats and vessels should not be scrubbed or cleaned for the first six months in the water and at intervals of not less than 3 months thereafter.

## SYSTEMS

Mix paint thoroughly to ensure toxicants are evenly dispersed throughout the can. All surfaces must be clean, dry and properly prepared prior to painting.

**Compatibility:** This product may be applied over most aged hard antifouling coatings. Old soft antifouling paints must be completely removed before applying this product. Old tin copolymers must be removed completely or sealed with [Pettit 6627 Tie-Coat / Primer] before applying this product. Please read and understand the label and/or Technical Bulletin for these products as well to ensure that they are used properly.

**Previously Painted Surfaces:** If the previous coating is in good condition thoroughly sand with 80 grit paper and wipe clean with a rag dampened with [Pettit 120 Brushing] Thinner to remove sanding residue.

Apply two coats of this product 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 copolymers should be removed or sealed with [Pettit 6627 Tie Coat Primer] before applying.

**Bare Fiberglass:** All bare fiberglass, regardless of age, must be thoroughly cleaned and de-waxed with [Pettit 92 Bio-Blue Hull / Surface Prep] or de-waxed several times with [Pettit D95 / Dewaxer]. Sand thoroughly with 80 grit sandpaper to a dull, frosty finish and rewash the sanded surface with [120 Brushing / Thinner] to remove sanding residue. Then apply two coats of this product, following application instructions.

**To eliminate the sanding operation, two methods are available:**

1. Clean and de-wax the surface as described above, apply one very thin coat of [6998 Skip-Sand / Primer] using 3/16" or less nap roller or brush apply. Consult the primer label for complete application and antifouling top-coating instructions. Then apply two coats of this product or
2. Clean, de-wax and etch the surface with [92 Bio-Blue Hull / Surface Prep] using a coarse Scotchbrite® pad in a swirling motion. Clean off all residue by rinsing or wiping off with fresh water. Apply one coat of [Pettit Protect / Epoxy Primer]. Consult the primer labels for complete application and antifouling top-coating instructions. Then apply two coats of this product.

**Barrier Coat:** Fiberglass bottoms potentially can form osmotic blisters within the gelcoat and into the laminate. To render the bottom as water impermeable as possible, prepare the fiberglass surface as mentioned above (sanding method) then apply three coats of [Pettit Protect 470014701 Gray High Build or Pettit Protect 4100/4101 White High Build Epoxy Primer / Epoxy Primer] per label directions. Apply two finish coats of product.

**Blistered Fiberglass:** Consult your [Pettit / Technical] Representative.

**Bare Wood:** Sand the entire surface with 80 grit production paper and wipe clean with a rag dampened with [120 Brushing / Thinner]. Apply a coat of this product thinned 25% with [120 Brushing / Thinner] to penetrate and seal the wood. Fill any open seams with [Pettit / Seam Compound] and allow to dry overnight. Apply two full coats of this product observing the proper drytimes.

**Steel Hulls, Underwater Metal Parts and Keels:** For steel hulls and metal keels, consult [TB431 High Build / product priming instructions for] Epoxy Primer for complete priming instructions or consult the Pettit Technical Department or your local Pettit representative. For underwater metal parts, consult [TB112 Underwater Running Gear Painting / Specification / the Pettit Technical Department] or your local Pettit representative for complete priming and application details.

**Keels-Lead:** Abrade surface to bright metal. Clean off residue. Apply one thin coat of Metal Primer. Allow to dry two hours. Apply one coat of Primer, then, if fairing is required, apply Fairing Compound. Follow with an additional coat of Primer per label directions. Apply two finish coats of product.

**All Other Substrates:** Please contact your [Pettit / Technical Representative] at **1-800-221-4466** for full information on proper priming and painting procedures for all other substrates.

**Questions:** Please contact your [Pettit / Technical Representative] at **1-800-221-4466**.

### DO NOT USE THIS PRODUCT ON ALUMINUM HULLS OR OUTDRIVES

**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 to the extent consistent with State law, when not used as directed.

**MEDICAL EMERGENCIES: 1-800-548-0489** Manufactured in U.S.A. P3003 GA.-9/13  
**PRODUCT INFORMATION: 1-800-221-4466 / WWW.PETTIT PAINT.COM**

**PHYSICAL DATA: Vehicle Type:** Modified Epoxy/Resin **FINISH:** Flat, **Curing Mechanism:** Solvent Release, **SOLIDS (theoretical)** By weight: .839 +/- 2%, By volume .62 +/- 2%