

60061-94

06/06/2001

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUN 06 2001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Kop-Coat, Inc.
3020 William Pitt Way
Pittsburgh, PA 15238

Attention: Kim Treloar

Subject: Pettit Marine Paint Ultima SR Ablative Biocide Bottom Paint
EPA Registration Number 60061-94
Your Submission Dated February 20th, 2001
EPA Received Date March 1st, 2001

The submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, to change the product name and revise the product labeling is acceptable provided that you make the following changes:

1. Revise the subheading "Statement of Practical Treatment" to read "First Aid".
2. Revise the "First Aid" statement to read as follows:

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.

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 anything by mouth to an unconscious person.

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 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.

- 3. The following general statement is required to be included with the First Aid statements:

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

- 4. Include a "Note to Physician" section to read as follows:

- "Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage."

- 5. Revise the phrase "other ingredients" to read "inert ingredients".

The registration record for the product has been amended to include the product name listed below:

OLD: Pettit Marine Paint ACP Ultima

NEW: Pettit Marine Paint Ultima SR Ablative Dual Biocide Anti-fouling Bottom Paint

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

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

Sincerely,



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

PETTIT

marine  paint

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 of 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.

Ultima^{SR}

**ABLATIVE DUAL BIOCIDES
ANTIFOULING BOTTOM PAINT**

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 06 2001

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

60061-94

- Slime resistant.
- High copper content.
- Multi-season technology.
- Self-polishing.
- Reduces paint build-up through controlled erosion.
- Excellent for fiberglass, wood & steel boats.

COMMERCIAL AND NON-COMMERCIAL USE
KEEP OUT OF REACH OF CHILDREN.

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

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

50-474-D 10/24/00

3/4

ULTIMA SR
PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND 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 or inhaled. Do not breathe vapors, spray mist or sanding dust. While spraying and/or sanding boat surfaces, wear a NIOSH/MSHA certified mask or respirator. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling. May pose an aspiration pneumonia hazard.

STATEMENT OF PRACTICAL TREATMENT

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. **In eyes:** Flush with plenty of water and get medical attention. **On skin:** Wash with plenty of soap and water. **If inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

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 into sewer system without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS: Do not use or store 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, CO₂ or dry chemical. Wear NIOSH/MSHA certified breathing equipment.

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

PESTICIDE DISPOSAL: 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: Triple rinse (or equivalent) and dispose of in an approved landfill. Consult Federal, State or local disposal authorities for approved alternative procedures.

VOC: (as supplied) 399 grams/liter maximum.

GENERAL DESCRIPTION: Pettit *Ultima SR* Ablative Dual Biocide Antifouling Bottom Paint is an antifouling protective coating resistant to slime, algae, barnacles and other marine fouling organisms. The high loading of cuprous oxide combined with an organic algicide offers unprecedented control over all types of fouling even in the most severe fouling areas. *Ultima SR*'s unique controlled erosion minimizes coating build-up and keeps underwater surfaces smooth and clean.

DIRECTIONS FOR USE

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

PREPARATION OF SURFACE: The surface to be painted should be clean, dry and free of any contamination or foreign matter. Always prepare the surface to be painted by sanding and solvent cleaning before any paints or primers are applied. When sanding old antifouling paint use a dust mask to prevent the inhalation of sanding dust. Old, soft bottom paints must be completely removed before applying.

COVERAGE, APPLICATION AND TEMPERATURE: *Ultima SR* can be applied by brush, roller or spray. All painting should be done between 9:00 a.m. and 4:00 p.m. in order to avoid the possibility of dew or condensation spoiling the application. The temperature range of application should be between 50 and 90°F. At least two, and preferably three coats, should be applied for best performance, particularly in high wear areas such as the waterline. *Ultima SR* will cover approximately 400 square feet per gallon.

PREPARATION OF PAINT: *Ultima SR* 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.

THINNING: Use Pettit ACP Thinner for thinning *Ultima SR* if needed, particularly on warm or breezy days. ACP Thinner can also be used to thin *Ultima SR* for spraying and for cleaning equipment. Do not thin more than 10% (12 ounces per gallon) or inadequate paint film thickness will occur and premature erosion of the finish will be likely.

DRY TIMES: The minimum recoat time is 6 hours. The minimum dry time between the final coat and launching is 16 hours. Under adverse drying conditions such as those encountered on cool or damp days extend the dry times by 50% in order to ensure that all the solvent is out of the paint film. There is no maximum time before launching.

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, salt, dirt, oil, blackish 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. Scrubbing is particularly important with boats that are idle for extended periods of time. The self-cleaning nature of the coating is most effective when the boat is used periodically.

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.

DO NOT APPLY *ULTIMA SR* ON ALUMINUM HULLS OR OUTDRIVES.

PREVIOUSLY PAINTED SURFACES: If the previous coating is in good condition, thoroughly sand with 80-grit paper, then solvent clean with 185 ACP Thinner to remove residue. Apply two finish coats of *Ultima SR*. If the previous coating is soft or in poor condition, remove to the bare surface by sanding or using a paint and varnish remover. Proceed with appropriate bare system as described below. Old tin copolymers should be removed or sealed with Pettit 6627 Tie-Coat Primer before applying *Ultima SR*.

BARE FIBERGLASS: All bare fiberglass, regardless of age, should be thoroughly cleaned several times with Pettit 95 Dewaxer or 120 Brushing Thinner. Sand thoroughly with 80-grit sandpaper to a dull, frosty finish and rewash the sanded surface with 95 Fiberglass Dewaxer or 120 Brushing Thinner to remove sanding residue. Then apply two coats of *Ultima SR* following application instructions. Careful observation of the above instructions will help ensure long-term adhesion of this and subsequent years' antifouling paint. To eliminate the sanding operation, wash the fiberglass three times using Pettit 95 Dewaxer only. Then apply one coat of Pettit 6999 Sandless Primer. Read and follow carefully the application and topcoating instructions on the Sandless Primer label. Apply at least two coats of *Ultima SR*.

BARE WOOD: Sand entire surface with 80-grit paper, wash clean with 185 ACP Thinner. Apply a coat of *Ultima SR* thinned 25% with 185 ACP Thinner, allow an overnight dry, lightly sand and wipe clean. Apply two finish coats of *Ultima SR*.

BARE STEEL: Sandblast to clean, bright metal and remove blasting residue with clean, dry compressed air or a clean brush. Immediately apply two coats of Pettit 4700/4701 High Build Epoxy Primer. Read and follow carefully the instructions on the 4700/4701 Epoxy Primer label. If the surface to be painted will be prepared using hand tools such as wire wheels or sanders, clean off residue and immediately apply one coat of Pettit 6980 Rustlok Steel Primer. Let dry 1-2 hours and follow with two coats of Pettit 4700/4701 High Build Epoxy Primer. Read and follow carefully the instructions for application and topcoating on both primer labels.

UNDERWATER METAL PARTS: Use Pettit 6456 Underwater Metal Kit for surface preparation instructions and priming underwater metal running gear.

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 therefrom.

Medical Emergencies
1-800-548-0489

MADE IN USA P3248 1297GA 10/00

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUN 06 2001

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

60061-94

ACTIVE INGREDIENTS:

Cuprous Oxide	60.0%
N-Cyclopropyl-N1(1,1-dimethyl)yl	
-6-(methylthio) -1,3,5 triazine-2	
4-diamine	2.0%

OTHER INGREDIENTS

38.0%

100.0%

COPPER AS METALLIC

53.3%



This product contains petroleum distillates.

EPA EST. NO. 60061-NJ-2
EPA REGISTRATION NO. 60061-94

KUP-COAT INC.
PETTIT PAINT DIV.
ROCKAWAY, NJ 07866

An **RPM** Company

4/4