

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

DEC **2 9** 2005

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Alan Ross Vice President for, Kop-Coat, Inc. 1850 Koppers Building Pittsburgh, PA 15219

Subject: Pettit Marine Paint Ultima Plus Antifouling Paint

EPA Registration Number 60061-117 Your Application Dated October 27th, 2005 EPA Received Date October 28th, 2005

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act(FIFRA), as amended, to change the product name, is acceptable on a time limited basis.

Currently, all end-use antifoulant paint formulations containing Irgarol are registered on a time limited basis. In order to allow the Agency time to review your supplier's response to the Agency's Environmental Risk Assessment for Irgarol. This conditional registration will expire automatically on June 15th, 2006.

This conditional registration will expire automatically on June 15th, 2006. If you fail to satisfy the conditions imposed in registration, EPA may issue a Notice to Cancel under section 6(e) of FIFRA.

Our records have been amended to reflect the following:

OLD NAME: Pettit Marine Paint Ultima Plus Antifouling Paint

NEW NAME: Pettit Marine Paint Ultima SR Antifouling Paint

A stamped copy of the labeling 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(7510C)



ACCEPTED with COMMENTS EPA Letter Dated:

DEC 29 2005

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

60061-117

Ultima SR

ANTIFOULING PAINT

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

ACTIVE INGREDIENTS:

Cuprous Oxide 40.00% N-Cyclopropyl-N'(1,1-dimethyethyl) -6-(methylthio) –1.3,5 triazine-2

-6-(methylthio) –1,3,5 triazine-2 4-diamine 2.00%

INERT INGREDIENTS: 58.00%
Total 100.00%

COPPER AS METALLIC 35.52%

This product contains petroleum distillates.

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

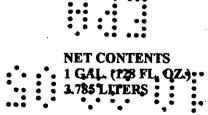
WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

EPA EST. NO. 60061-NJ-2 EPA REGISTRATION NO. 60061-117

KOP-COAT, INC. PETTIT PAINT BRAND ROCKAWAY, NJ 07866

An RPM Company



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.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes eye irritation. Harmful if absorbed through skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. 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 vapora, apray 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.

	FIRST AID
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:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. 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 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.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
	HOT LINE NUMBER ainer or label with you when calling a poison control center or doctor, or going for so contact 1-800-548-0489 for emergency medical treatment information.
Contains petroleum dis	NOTE TO PHYSICIAN stillates. Vomiting may cause aspiration pneumonia.

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 treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS: FLAMMABLE! Keep away from heat, sparks and 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 MSHA/NIOSH 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: Trigle ring (en quivalent) and dispose of in an approved landfill. Consult Federal, State or local disposal authorities for approved alternative procedures.

WARNING: THIS PRODUCT CONTAINS A CHEMICAL KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER, BIRTH DEFECTS OR OTHER REPRODUCTIVE HARM.

DIRECTIONS FOR USE

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

Product Description: Settle Marine Point Ultima Plus Amifouling Paint is an abilitive antifouling coating designed to polish away at a controlled at a constantly exposing a fresh surface which provides excellent season-long antifouling protection. The high loading of currous gaids in the formula enables the paints a perform well in even the most severe fouling areas. The controlled erosion minimizes costing buildup and keeps underwater surfaces smooth and clean. This product may be applied on fiberglass, wood and properly primed steel bosts.

Compatibility: This product may be applied over most aged hard antifouling coatings and over most copper-based ablative antifouling coatings. Old soft antifouling paints must be completely removed before applying this product.

Mixing: 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 a trie drill mixer, pour off half

of the liquid from the top of the can into another can and then property mix in any settled pigment, then remix the two parts together thoroughly.

Application Temperatures: 50°F and above.

Application Method: Brush, roller or spray.

Thinner: Thinning this product is not normally required. If thinning is necessary, use Pettit 185 ACP Thinner only. 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.

Coverage: This product covers approximately 500 square feet per gallon.

Number of Coats: For best antifouling protection at least two full coats of this product are recommended for the first years protection. It is a good idea for the first coat to be painted in a different color from the top coats. As the topcoat wears away, the base color will start to show through, signaling that it will soon be time to haul and repaint.

Dry Times: To recost 8 hours 90°F 3 hours 6 hours 16 hours 70°F

50°F 12 hours 24 hours The above dry times are minimums. This product may be recoated and launched after minimum times shown. There is no maximum dry time before launching.

VOC: Less than 330 g/l unthinned.

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. Scrubbing is particularly important with boats that are idle for extended periods of time. The self-cleaning nature of the costing is most effective when the boat is used periodically.

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 salesmen or 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 185 ACP 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 copolymer paints must be removed before applying this product.

Bare Fiberglass: All bare fiberglass, regardless of age, must be thoroughly cleaned using Pettit 95 Fiberglass Dewaxer and clean lint-free rags. Several cleanings may be necessary to ensure complete removal of contaminants. Change rags frequently during the downxing/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 95 Dewaxer or 120 Brushing Thinner to remove sanding residue. Apply two coats of this product 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 Petrit 95 Fiberglass Dewaxer. Then apply one thin continuous cost of Pettit 6999 Sandless Primer. Topcost with two costs of this product 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 185 ACP Thinner. Apply a cost of Pettit 6627 Tie Cost Primer thinned 10% 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

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 Pettit Protect Broxy Primer. Read and follow carefully the instructions on the 4700/4701 Pettit Protect 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 cost of Pettit 6980 Rustlok Steel Primer. Let dry 1-2 hours and follow with two costs of Pettit 4700/4701 Pettit Protect Epoxy Primer. Read and follow carefully the instructions for application and topcoating on both primer labels.

Underwater Metal Parta: 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 user his material in beyond our control, we disclaim responsibility for its handling, use, storage, the results obterous by the new last and the control of the co of any nature resulting therein. EPA Letter Dated:

DO NOT USE THIS PRODUCT ON ALUMINUM HULLS OR OUTDRIVES

MEDICAL EMERGENCIES: 1-800-548-0489 PRODUCT INFORMATION: 1-800-221-4466 Mede in U.S.A. P3288 1298 GA.-3/03 **DEC 29** 2005

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