UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEPA United States Environmental Protection Office of Pesticide Programs

(4/19/2011

Kop-Coat, Inc. 1850 Koppers Building Pittsburgh, PA 15219 APR 1 4 2011

Attention: Kim Treloar Product Registration Specialist

Subject: Pettit Ultima SSA LD Ablative Antifouling Paint EPA Registration No. 60061-132 Your Letter Date April 7, 2011

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- To update product label and stamp label for registrations in the states

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

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

Marshall Swindell Product Manager 33 Regulatory Management Branch 1 Antimicrobials Division (7510P)

Enclosure



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 SSA LD ABLATIVE ANTIFOULING PAINT

- Uses New Low Density Copper Technology
- Economical Antifouling Protection
- Apply Over Most Other Antifoulings
- Excellent for Fiberglass, Wood & Steel Boats.

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

COMBUSTIBLE LIQUID AND VAPOR. VAPOR HARMFUL. FATAL IF SWALLOWED. SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.
 ACTIVE INGREDIENT:

 Cuprous Oxide
 23.70%

 INERT INGREDIENTS:
 76.30%

 TOTAL
 100.00%

COPPER AS METALLIC 21.05%

This product contains petroleum distillates.

EPA EST. NO. 60061-NJ-2 EPA REGISTRATION NO. 60061-132

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

ACCEPTED with COMMENTS * EPA Letter Dated:

APR 1 4 2011

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e. and Rodenticide Act as

for the pesticide, inder EPA Reg. No. 6006/-132

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes eye irritation. Harmful if absorbed through skin. Avoid contact with skin, eyes or Idothing. Wear protective clothing such as gloves, long-sleeved cotton shirt, long pants and hat. May be fatal if swallowed or inhaled. Do not breath sanding dust or vapor. Wear a mask or a respirator jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health. by the Pine Safety and reach administration and the National Institute for Occupational Safety and reach. Remove contaminated clothing and wash clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco or using the toilet.

| FIRST AID | | |
|----------------------------|--|--|
| IF SWALLOWED: | Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor Do not give any liquid to the person. Do not give anything by mouth to an unconscious person. | |
| 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 ON SKIN OR CLOTHING: | * Take off contaminated clothing. * Rinse skin immediately with plenty of water for 15 – 20 minutes. * Call a polson control center or doctor for treatment advice. | |
| 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. | |
| or going for treatment. | ve the product container or label with you when calling a poison control center or doctor, You may also contact 1-800-548-0489 for emergency medical treatment information. | |
| NOTE TO PHYSICIAN: C | Contains petroleum distillate – vomiting may cause aspiration pneumonia. | |

ENVIRONMENTAL HAZARDS

This material is toxic to fish. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwaters or rinsate. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other water 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 Liminaton discharge this product to sever systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. Do not allow chips and dust generated during paint removal to enter water. Dispose of paint debris in an

approved landfill PHYSICAL OR CHEMICAL HAZARDS: Combustible. 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 MSHA/NIOSH certified breathing equipment

STORAGE AND DISPOSAL

Pesticide Storage: Do not contaminate water, food, or feed by storage or disposal. Store in a closed, properly labeled container in a cool place. If static generating conditions exist, provide necessary grounding and bonding. Keep containers closed when not in use.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spra mixture, or rinsate is a violation of Federal law. It 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.

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available Container disposal: Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more time

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 Mine Safety and Health Administration (formerty the U.S. Bureau of Mines) and by the National Institute for Occupational Safety and Health under the provisions of 30 CFR II.

NOTICE! This product contains a chemical known to the State of California to cause cancer, birth defects or other reproductive harm. Product Description: This product utilizes the latest development in copper technology. Low density

cuprous oxide contains the same level of copper by volume as traditional cuprous oxide but at a much lower

weight and therefore less copper by weight is needed to provide maximum protection from fouling of all kinds. Low density copper guards against attachment of barnacles, annelids, tunicates, bryozoa, hydroids, algae and other fouling organisms. This product applies easily and dries quickly. May be used over old antifouling finishes in good condition. This product is ideal for wood, fiberglass and properly primed steel boats

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Compatibility: This product may be applied over most aged hard and soft antifouling coatings. Old tin

Compatibility: This product may be applied over most aged hard and soft antifouling coatings. Old tin copolymers and Teflow Binishes must be completely removed before applying this product. Mixing: 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 padle 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 used in the number the earlier with the avert 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 and above.

Application Method: Brush, roller or airless or conventional spray. Thinner: For the first coat on new or bare wood, thin 10% with Pettit 120 Brushing Thinner. For other uses thinning is not normally required. Do not thin beyond your State's VOC limit.

Coverage: 500 sq. ft. per gallon. Number of Coats: On new or bare wood use 3 coats, allowing at least 3 hours between applications. On

old painted hulls in good condition and on primed steel or primed fiberglass, apply one full coat of this paint followed with a second coat where severe fouling exists as in tropical waters. Drv

| To recoat | To launch |
|-----------|--------------------|
| 2 hours | 2 hours |
| 3 hours | 4 hours |
| 6 hours | 8 hours |
| | 2 hours 3 hours |

The above dry times are minimums. This product may be recoated and launched after the minimum times shown. There is no maximum dry time before launching.

VOC: 320 grams/liter (2.67 lbs/gallon) as supplied. PAINT SYSTEMS

The paint systems outlined below contain references to other Pettit products. Please read and understand The Jahr 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 Pettit Customer Service Department at (800) 221-4466 between the hours of 8:30 a.m. and 4:30 p.m. EST

221-4466 between the hours of 8:30 a.m. and 4:30 p.m. EST **Previously Painted Suffaces:** If the previous coating is in good condition, thoroughly sand with 80-grit production paper and wipe clean with a rag dampened with Pettit 120 Brushing Thinner to remove coating residue. Apply two coats of this product 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 tin copolymer paints and teflon finishes must be removed the transmission of the surface below.

before applying this product. Bare Fiberglass: All bare fiberglass, regardless of age, must be thoroughly cleaned using Pettit Bio-Blue ball erhologitass, nu bale holegass, regardless of age, must be thologing cleaned using retuit biobaile Hull Surface Prep 92 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 ninsed with fresh water prior to dewaxing. After the surface has been dewaxed, sand it thoroughly with 80-gnit production paper and rewash the sanded surface with Pettit 1020 Bruching Thiongs the means paneling exciting which means the sanded surface with Pettit 20 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 Petiti Bio-Blue Hull Surface Prep 92. Then apply one thin continuous coat of Petiti 6998 Skipsand Primer. Topcoat with two coats of this product carefully following the topcoating instructions on the Skipsand Primer label.

His product cardiany loading the opposition in a declaration of the opposition rate and the analysis of the angle and the angle and the angle and the angle and the petitic 120 Brushing Thinner. Apply a coat of this product thinned 10% with the Petiti 120 Brushing Thinner to penetrate and seal the wood. Fill any open seams with Petiti Seam Compound and allow to dry overnight. Apply two full coats of this product observing the proper dry times. Steel Hulls, Underwater Metal Parts and Keels: For steel hulls and metal keels, consult Pettit

Technical bulletin TB431 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 Paint Specification for complete priming and application details.

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.

Manufactured by Kop-Coat Marine Group, Pettit Paint Brand, Rockaway, NJ 07866 MEDICAL EMERGENCIES: 1-800-548-0489 PRODUCT INFORMATION: 1-800-221-4466 MADE IN U.S.A. 12

MADE IN U.S.A. 1282 GA 2/10

ACCEPTED with COMMENTS EPA Letter Dated:

APR 14 2011

Under the Federal Insecticide. Fungiciae and Rodenticide Act as amended for the pesticide, registered under EPA Keg. No. 60061-132