



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 2, 2019

Mr. Frank Winkelman
Director of Research and Development for,
Kop-Coat, Inc.
36 Pine Street
Rockaway, NJ 07866

Subject: Notification per PRN 98-10 – To add the claim, “Excellent for Inflatable Boats”, to the product labeling
Product Name: Pettit Hydrocoat LD Ablative Antifouling Paint
EPA Registration Number: 60061-135
Application Date: November 7, 2019
Decision Number: 557501

Dear Mr. Winkelman:

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.

Page 2 of 2
EPA Reg. No.
Decision No.

If you have any questions, you may contact Karen M. Leavy at (703)-308-6237 or via email at Leavy.Karen@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Karen M. Leavy Esq,". The signature is written in a cursive style with a large initial 'K' and a trailing comma.

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



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 to the extent consistent with State law. 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.

Hydrocoat LD

ABLATIVE ANTIFOULING PAINT

- **Economical hybrid protection**
- **Smooth durable polishing finish**
- **Apply over most antifouling paints**
- **Easy Cleanup**
- **Reduces paint buildup through controlled erosion**
- **Excellent for fiberglass, inflatable fabric, and steel boats**
- **Uses Composite Copper Technology**
- **Excellent for Inflatable Boats**

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

KEEP OUT OF REACH OF CHILDREN

WARNING

CAUSES EYE IRRITATION. HARMFUL IF ABSORBED THROUGH SKIN.
MAY BE FATAL IF SWALLOWED OR INHALED.
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

NOTIFICATION

6006-135

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:

12/02/2019

ACTIVE INGREDIENT:

Cuprous Oxide*	25.25%
(CAS# 1317-39-1)	
INERT INGREDIENTS:	<u>74.75%</u>
TOTAL	100.00%

COPPER AS METALLIC 22.42%

EPA EST. NO. 60061-NJ-2
EPA REGISTRATION NO. 60061-135

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. 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 plus socks.

While removing existing paint by sanding or blasting, or applying new antifoulants paint, users must wear a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (NIOSH approval number prefix TC-23C), or a canister approved for pesticides (NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any **N, R, P,** or **HE** prefilter.

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.

FIRST AID

IF INHALED:	<ul style="list-style-type: none"> • 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 SWALLOWED:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water of 15-20 minutes. • Call a poison control center or doctor for treatment advice.

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

Probable mucosal damage may contraindicate the use of gastric lavage. This product contains petroleum distillates. Vomiting may cause aspiration pneumonia.

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 your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS: 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 certified breathing equipment.

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 Disposal: 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's durable hybrid surface resists paint buildup by slowly polishing which constantly exposes a fresh surface for economical antifouling protection. The controlled erosion minimizes coating buildup and keeps underwater surfaces smooth and clean. This product cleans up with soap and water and may be applied on all boat substrates except aluminum. This product is for use in fresh, salt or brackish water on hulls below the waterline and is resistant to barnacles, algae and other fouling organisms. This paint is intended for use on recreational and commercial vessels of any size.

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.

Coverage, Application and temperature: This product can be applied by brush, short nap 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. This product will cover approximately 500 square feet per gallon when applied at 2 dry mils film thickness.

Preparation of Paint: This product contains cuprous oxide. As a result, 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. A mechanical paint shaker will do the fastest most thorough job of mixing. If mixing is to be done with a wooden paddle or 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. Regardless of the mixing method, check the sides and bottom of the can before and during use to make sure all contents are thoroughly mixed.

Thinner/ Clean-Up: Use 140 Water-Based Brushing Thinner. Thinning this product is not normally required. Do not thin more than 10% by volume (12 ounces per gallon).

Number of Coats: Two or three 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.

Dry Times:	To recoat	To launch
90°F	1 ½ hours	6 hours
70°F	3 hours	10 hours
50°F	6 hours	16 hours

The above dry times are minimums. This product may be recoated and launched after the minimum times shown. Dry times will vary with environmental conditions. If unsure of the dry time, it is safer to launch later rather than earlier. There is no maximum dry time before launching.

VOC: 145 grams/liter (1.25 lbs/gal) maximum.

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. 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 contents are evenly dispersed throughout the can. All surfaces must be clean, dry and properly prepared prior to painting.

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 or 140 Water-Based 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.

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 or 140 Water-Based 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 6998W 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. Clean off all residue by rinsing or wiping off with fresh water. Apply one coat of Pettit Protect Epoxy Primer 4700/4701 or H2Prime 4740/4741. Consult the primer labels for complete application and antifouling top-coating instructions. Then apply two coats of this product.

Bare Wood: Sand the entire surface with 80 grit production paper and wipe clean with a rag dampened with 120 Brushing Thinner. A primer coat of Pettit 6627 Tie Coat Primer should be applied directly to bare wood. Allow to dry 4 hours, then apply two unthinned coats of this product per instructions

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 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

Rubberized Fabric Surfaces: Scrub the rubberized fabric surfaces with a bronze wool pad dipped in Pettit 97 Epoxy Thinner. Choose a small area on the surface to be painted and scrub the surface lightly but thoroughly, making sure the surface is completely wetted by the 97 Epoxy Thinner. Once all the fabric has been treated with the 97 Epoxy Thinner wipe up all residue and allow the fabric to dry for one hour. Once the surface has been properly prepared, apply a generous coat of this product. Allow the paint to dry to recoat and apply a full second coat. Consult the dry to recoat/dry to launch time-temperature chart above for specific recoat and launch times.

NOTE: All antifouling paints may leave a stain if left in contact with other objects. When the boat is pulled out of the water for storage on deck or on a dock, clothing, deck and dock surfaces coming in contact with the antifouling paint may experience staining if rubbed against the antifouling paint.

All Other Substrates: Please go to www.pettipaint.com and consult the product data sheet.

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..

MEDICAL EMERGENCIES: 1-800-548-0489

Manufactured in the United States

PRODUCT INFORMATION: 1-800-221-4466 or www.pettitpaint.com