

85396-1

12-04-2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Coppercoat USA LLC
Harbor Front House
34 Panorama Road
Sandbanks Poole
United Kingdom

DEC 4 2009

AGENT: Ag-Chem Consulting
12208 Quinque lane
Clifton, VA 20124

Attention: Matthew Brooks

Subject: Coppercoat Copper Powder
EPA Registration No. 85396-1
Amendment Dated November 4, 2009

This will acknowledge receipt of your notification of minor label revisions, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

Please note that your "Storage and Disposal" section must conform with the "Container Rule" under PR Notice 2007-4. Place the instructions for "Bag Disposal" in the storage and disposal section.

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

Sincerely

A handwritten signature in black ink that reads "Martha Terry" with a stylized flourish at the end.

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Coppercoat USA LLC/85396-1	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Coppercoat/ Coppercoat Copper Powder	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Coppercoat USA LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Minor Revisions
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. 1 kg No. per container 1	If "Yes" Package wgt. _____ No. per container _____

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container
1 kg

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
 Lithograph Paper glued Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Dr. Matthew Brooks	Title Regulatory Consultant	Telephone No. (Include Area Code) 703-266-0128
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Certification
 I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Regulatory Consultant	6. Date Application Received (Stamped)
4. Typed Name Matthew Brooks	5. Date 11-4-09	



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks@ag-chem.com
(703) 266-4377 Fax

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November 4, 2009

Marshall Swindell
Antimicrobial Division (AD)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Coppercoat Copper Powder
EPA Reg. No. 85396-1
Notification of Minor Revisions

Dear Mr. Swindell,

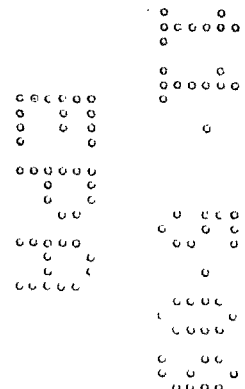
Ag-Chem Consulting, on behalf of Coppercoat USA, LLC., hereby submits the following notification for the above product. We have made the following revisions:

- Changed from Metric to English measurements
- Added additional instructions related to cleaning or pre-cleaning of surfaces as per PR Notice 98-10, Section II (M)(1)(b)
- Other minor language changes.

All changes are noted in red. Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Coppercoat USA LLC



Label for plastic bag holding copper powder

COPPERCOAT Copper Powder

THIS PRODUCT IS A PART OF A THREE COMPONENT PRODUCT.
TO BE MIXED ONLY WITH THE RESIN AND HARDENER PACKAGES CONTAINED
WITH IT.

For use as a general antifoulant for freshwater and marine vessels.

Active Ingredient (powder portion only):

Copper Powder	99.7%
Other Ingredients	<u>0.3%</u>
Total	100%

EPA Registration # 85396-1
 EPA Establishment # 85968-GBR-001
 85396-FL-001

WARNING

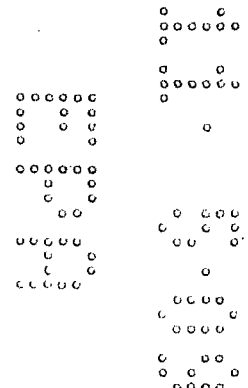
KEEP OUT OF REACH OF CHILDREN

Bag Disposal: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into mixing container. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by the state and local authorities, by burning. If burned stay out of smoke.

Directions For Use

Mix the entire contents of this only with the other portions of this product. Mix immediately prior to use. See foldout for additional directions for use and application instructions.

Coppercoat USA
 1403 S. Patrick Dr., Unit 15
 Indian Harbour Beach, FL 32937
 Phone: 321-514-9197



COPPERCOAT ANTIFOUL

COPPERCOAT Copper Powder must be mixed with the Resin and Hardener before use.

For use as a general antifoulant for freshwater and marine vessels.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye damage. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear protective eyewear (goggles, face shield or safety glasses), rubber gloves, and a mask or pesticide respirator jointly approved by National Institute of Occupational Safety and Health. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

FIRST AID	
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 five 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 for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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. • 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.
HOT LINE NUMBER	
<p>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.</p>	

ENVIRONMENTAL HAZARDS

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 Pollutant 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 and Chemical Hazards

Warning: Do not breathe dust or fumes. Use only with adequate ventilation. Collect any spilled powder in a manner that minimizes further dust generation. Wear MSHA/NIOSH certified breathing equipment.

STORAGE AND DISPOSAL

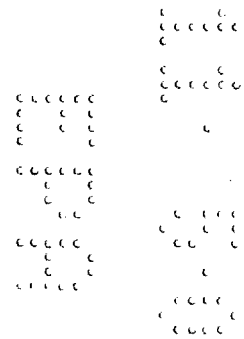
Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store Powder in original container inside a dry area, -20°C to 40°C (0° to 100°F). Powder will oxidize, do not leave container open.

If spilled carefully collect with dust pan and broom to minimize powder from getting into the air. Wear a particle mask when collecting. Place spilled material in plastic bag and disposed of in an approved waste disposal facility.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into mixing container. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by the state and local authorities, by burning. If burned stay out of smoke.



Directions For Use

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

[COPPERCOAT MULTI-SEASON PERFORMANCE ANTIFOULING]

FOR THE SUCCESSFUL APPLICATION OF COPPERCOAT MAKE SURE TO READ AND FOLLOW THESE INSTRUCTIONS CAREFULLY [Revision: Published May 16th 2009]

Aquarius Marine Coatings Coppercoat anti-fouling is based on a water miscible epoxy resin, which is heavily loaded with pure grade (99%) fine copper powder and a mix of biocides. When fully cured, this hard wearing epoxy treatment, which contains no banned compounds and is fully certified by the Health and Safety Executive (No. 7532) and approved by the U.S. EPA, forms a durable coating that offers exceptional long term resistance to marine fouling.

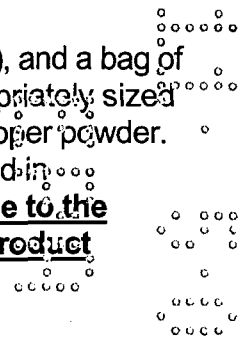
Surface Preparation:

Fiberglass: As is common with all epoxy coatings, it is important that the substrate to be coated is well prepared. All surfaces must be cleaned of all contaminants, including dirt, dust, grease, rust or loose paint. Two-part epoxy coatings, such as Coppercoat, must be applied to sound and permanent substrates - consequently all surfaces must be cleaned of any previously applied single-pack paint coatings or conventional anti-fouling. The best way to achieve this is to low-pressure slurry blast the hull, though old paint can be removed by hand. Finally, the hull must be abraded to provide a good profile for the new epoxy coating. The most efficient method is to use a random orbital electric sander, with 60 to 120 grit discs and paper. Remove the resulting dust before proceeding with the Coppercoat application - using either a soft brush or cloth. The hull can be washed with fresh water, but ensure this is allowed to dry before proceeding. Under no circumstances, should you clean the hull with any solvents or oil-based products (such as Acetone).

Iron, Steel, Aluminium, Ferro-cement, Wood: All can be equally successfully treated with Coppercoat. However, once these substrates have been cleaned, they must be primed with the appropriate epoxy system before proceeding with the Coppercoat application. Full instructions can be obtained from Aquarius Marine Coatings, as can a full range of the necessary epoxy primers.

Mixing :

Coppercoat is supplied in three parts; Part A (resin), Part B (hardener), and a bag of fine copper powder. Diligently mix Pack A with Pack B in an appropriately sized plastic container, then continue to mix while carefully adding the copper powder. Stir until a fully homogeneous mix is obtained, with all the copper held in suspension. Note: during the mixed pot life, the copper may settle to the bottom of the mixing bucket - consequently ensure to stir the product



regularly to maintain the copper suspension.

Pot Life:

The mixed pot life of Coppercoat is 60 minutes at 50 degrees Fahrenheit, 45 minutes at 68 degrees Fahrenheit and 30 minutes at 86 degrees Fahrenheit. Never mix more product than can easily be applied within the time available. We recommend that Coppercoat be mixed one litre [34 ounces] unit at a time.

Thinning:

Coppercoat should only be thinned with Isopropyl alcohol. Under normal circumstances, Coppercoat may be thinned (if necessary) by 5% for application by roller. Up to 10% thinner may be added for application by spray.

Environmental Conditions:

Do not attempt to apply Coppercoat if the ambient or hull temperatures are below 48 degrees Fahrenheit. With the epoxy being water miscible until cured, protect the hull from rain for 48 hours.

Application:

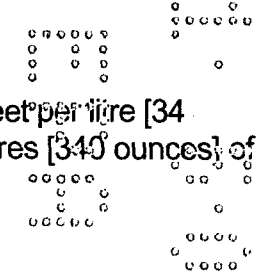
The product should always be applied directly after mixing. Do not attempt to apply Coppercoat by brush. For application by roller, short pile 1/4 inch simulated mohair or high quality neoprene foam sleeves should be used (but not light duty cardboard-backed foam rollers). Coppercoat can also be applied by conventional spray - please contact Coppercoat USA LLC for fuller details.

Under normal circumstances, a minimum of four coats are required. Second, third and fourth coats should be applied as soon as the previous coat allows - i.e. after approximately one hour at 68 degrees Fahrenheit. To ensure a satisfactory chemical bond between coats, all the required coats should be applied consecutively in a single day. Prior to launching lightly abrade the entire bottom with wet/dry fine sandpaper to expose some copper.

Note: on most boats, by the time the first coat has been completed, the start point is sufficiently cured to accept the second coat - consequently the application of the Coppercoat system is a continuous one. If the vessel to be treated is too large to be painted with all coats in one day by the workforce available, simply treat a manageable sized section - apply all the necessary coats to this section from start to finish in one day, before proceeding with a further section at a later date. If any product is left over after four coats have been applied continue the application until it is all used - this will ensure that the correct depth of copper is present. Never attempt to apply a coat too thickly as this will result in sagging and runs. Although the full cure is obtained after 5 days, the coating will be ready to launch after 96 hours and 68 degrees Fahrenheit. The cure rate will be faster in warmer conditions and slower in cooler conditions. Treated boats will benefit from having the cured Coppercoat surface lightly burnished with fine "wet and dry" paper or fine sanding pad prior to immersion - this will expose the copper powder and increase the immediate potency of the anti-fouling. This process is particularly beneficial in areas of high fouling and for those seeking the highest levels of anti-fouling performance.

Coverage Rate:

The effective coverage rate for a finished application is 42 square feet per litre [34 ounces]. Therefore, a hull of 420 square feet in area will need 10 litres [340 ounces] of Coppercoat in total for a complete treatment.



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Shelf Life:

12 months in sealed pots at 68 degrees Fahrenheit. Shelf life will be shortened if stored in warmer conditions. Keep protected from frost.

Tool Cleaning:

If the epoxy has not yet cured equipment can be cleaned in warm water. If necessary use Isopropyl alcohol thinners. Do not use white spirit, naphtha or methylated spirits.

Maintenance:

When correctly applied, this long life epoxy anti-fouling treatment should continue to deter marine fouling for many years, the annual chore of repainting associated with conventional anti-fouling, is no longer necessary. Damaged areas can be touched up as required. If, over the months, a slight accumulation of slime does appear, this can be removed by pressure washing or brushing. An annual wash or brush is recommended. Eventually, after several years, the surface may need to be lightly abraded with a fine grade of "wet and dry" paper or a burnishing pad to expose fresh copper.

Precautions:

Follow usual good hygiene practices and wash skin free of any product immediately, before it cures, using soap and warm water. Any splashes to the eyes should be washed immediately with plenty of clean water and medical advice sought. Read the hazard labels.

If you are in any doubt over the use or application of Coppercoat, please contact **Coppercoat USA LLC at 1-321-514-9197** for further advice and information.

Manufactured for
Coppercoat USA
1403 S. Patrick Dr., Unit 15
Indian Harbour Beach, FL 32937
Phone: 321-514-9197

EPA Registration #85396-1
EPA Establishment # 85968-GBR-001
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