

85396-1

07-16-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Dr. Matthew Brooks
Director of Ag-Chem Consulting
c/o Coppercoat USA LLC
12208 Quinque Lane
Clifton, VA 20124

JUL 16 2010

Subject: Coppercoat Copper Powder
EPA Registration Number 85396-1
Your Amendment Dated May 5th, 2010
EPA Received Date May 13th, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add revise the signal word and add the appropriate precautionary language as per California's Department of Pesticide Regulation's label review. is acceptable.

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

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

Sincerely,

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)

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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%

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

DANGER

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

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with COMMENTS
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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85396-1

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

DANGER: Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if swallowed, absorbed through skin or inhaled. Do not get in eyes, on skin or on 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 when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. 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>	

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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.

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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. When 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**

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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 ¼ 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.

Application Rate:

with COMMERCIAL EPA Letter Order. Therefore, a hull of 420 square feet in area will need 10 litres [340 ounces] of

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Coppercoat in total for a complete treatment.

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-foulings, 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.

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