

85396-1

10/17/2010

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



Office of Pesticide Programs

OCT 17 2010

Coppercoat USA LLC  
12208 Quinque Lane  
Clifton, VA  
20124

Attention: Matthew Brooks

**Subject: Coppercoat Copper Powder**  
EPA Registration No: 85396-1  
Notification Date: September 17, 2010

This will acknowledge receipt of your notification, to update the container handling statement and make minor changes to the product label, submitted under the provision of PR Notice 98-10

**Proposed Notification**

- Addition of Non-FIFRA language to copper bag label
- That the typographical errors be corrected, modify word "**part to pack**"

**General Comments**

Based on a review of the submitted material, the following comments apply:

The Notification dated November 4, 2009 is acceptable, and is in compliance with PR Notice 98-10. A stamped copy of this label has been placed in your files.

If you have any questions concerning this letter, please contact Zebora Johnson at (703) 308-7080.

Sincerely

  
 Marshall Swindell  
 Product Manger (33)  
 Regulatory Management Branch I  
 Antimicrobial's Division (7501P)



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)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

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

Notification of Addition of Non FIFRA Language, revised storage and disposal and correction of typographical errors  
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:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* 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 <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 kg		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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
<b>Certification</b> 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.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Matthew Brooks	5. Date 9-15-2010	



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 only with Coppercoat Antifoul Base Pack A and Coppercoat Antifoul Hardener  
Pack B**

**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

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.

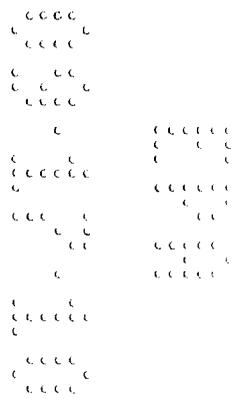
Directions For Use

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

ACCEPTED  
with COMMENTS  
EPA Letter Dated:  
OCT 17 2010

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



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**COPPERCOAT ANTIFOUL**

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

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, and the date of registration No. 853961

**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.

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first five minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>HOT LINE NUMBER</b>	
<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.

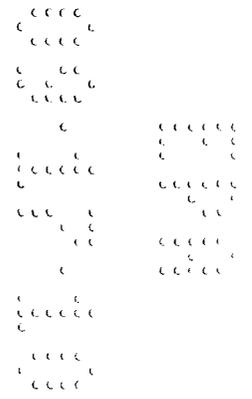
**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this 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.

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



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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.

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

**[COPPERCOAT MULTI-SEASON PERFORMANCE ANTIFOULING]** 863961

**FOR THE SUCCESSFUL APPLICATION OF COPPERCOAT MAKE SURE TO READ AND FOLLOW THESE INSTRUCTIONS CAREFULLY [Revision: Published May 16<sup>th</sup> 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; Pack A (resin), Pack 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

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**bottom of the mixing bucket - consequently ensure to stir the product regularly to maintain the copper suspension.**

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

**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

