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



# United States Environmental Protection Office of Pesticide Programs

DEC 15 2011

Coppercoat USA LLC c/o AG-Chem Consulting 12208 Quinque Lane Clifton, VA 20124

Attention: Matthew Brooks

Subject: Coppercoat/Coppercoat Copper Powder

EPA Registration No. 85396-1

Notification Dated November 15, 2011

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

# **Proposed Notification**

- Additional Non FIFRA Language

#### **General Comments**

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 added to your file.

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)

<b>ŞEPA</b>	United States  Environmental Protection Agency Washington, DC 20460				1	Amend Other		OPP Identifier Number
		Applicatio	n for Pestic	ide - Se	ction	1		
Company/Product Number Coppercaot USA LLC/85396-1			EPA Product Manager     Marshall Swindell			3. Proposed Classification  ✓ None Restricted		
I. Company/Product (Name) Coppercoat/ Coppercoat Copper Powder			PM# 33					
is Name and Address of Applicant (Include ZIP Code)  Coppercoat USA LLC c/o Ag-Chem Consulting 12208 Quinque Lane  Clifton VA 20124  Check if this is a new address			6. Expedited Reveiw. 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 -	-				
Resubmission in res  Notification - Explain  Explanation: Use addition  Notification of Addition of Notification of Addition of Societa is consisted labeling or the confidential sepa. I further understand the FIFRA and I may be subjected.	ponse to Agency letter  n below.  onal page(s) if necessa on FIFRA Language, it with the provisions of statement of formula of that if this notification is	PR Notice 98-10 this product. I unnot consistent with	and EPA regulation derstand that it is the terms of PR	Agency le "Me Too"  Other - Ex  ons at 40CFR a violation of Notice 98-10	Application by the state of the	eation.  elow.  6, and no oth C. Sec 100	ner changes 1 to willfully	make any false statement to
			Section -	III		P 15		
I. Material This Product Wi	il Be Packaged In:							
Child-Resistant Packaging Yes No Certification must	Yes  ✓ No  If "Yes"  Unit Packaging wgt.  No. per Container		Water Soluble Packaging  Yes No  If "Yes" Package wgt No. per container			2. Type of Container  Metal  Very Plastic Glass Paper Other (Specify)		
1 Kg 1		4. Size(s) Reta	ail Container 1 kg, 2kg		5. Lo	5. Location of Label Directions		
i. Manner in Which Label is		Lithogra Paper of Stencile	aph	Oth	er		(T)	
			Section -	IV				
. Contact Point (Complete	items directly below	for identification	of individual to	be contacted	, if nec	cessary, to p	process this	application.)
lame Dr. Matthew Brooks			itle Regulatory Consultant			Telephone No. (Include Area Code) 703-266-0128		
I certify that the state I acknowledge that a both under applicable	ements I have made or ny knowlinglly false or	Certificat n this form and a misleading stat	all attachments t	hereto are tru unishable by	ie, acc fine or	urate and c imprisonme	omplete.	6. Date Application Recoived (Stamped)

3. Title

5. Date

Regulatory Consultant

11-15-2011

!. Signature

. Typed Name

Matthew Brooks



**AG-CHEM CONSULTING** 

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 <u>MWBROOKS@AG-CHEM.COM</u>
(703) 266-4377 FAX

November 15, 2011

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 additional Non-FIFRA language

Dear Mr. Swindell,

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

For Use only with Coppercoat Antifoul Base Pack A and Coppercoat Antifoul Hardener Pack B

Each kit contains enough product to treat 42sq. ft. with 4 coats

These statements are required in order to obtain registration in California.

No other changes have been made to the label. The aforementioned change has been noted in <u>red</u>. 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

16

An Authorized Representative for Coppercoat USA LLC

# **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 0.3%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 Net Weight

# COPPERCOAT ANTIFOUL

COPPERCOAT Copper Powder must be mixed with the Resin and Hardener before use. Each kit contains enough product to treat 42 sq. ft. with 4 coats.

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> <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>
IF ON SKIN OR CLOTHING:	<ul> <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>
IF INHALED:	<ul> <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>
IF SWALLOWED:	<ul> <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>

#### **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.

#### **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.

### **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 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 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 alchohol. 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.

# 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.

#### 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 alchohol 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.

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

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