



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 3, 2022

Matthew Brooks  
Regulatory Agent  
Coppercoat USA LLC  
c/o Ag-Chem Consulting  
12644 Chapel Rd  
Clinton, VA 20124

Subject: Label Amendment – Add Use to Label and Other Label Edits  
Product Name: Coppercoat Copper Powder  
EPA Registration Number: 85396-1  
Received Date: June 5, 2020  
Action Case Number/Decision Number: 00218661

Dear Matthew Brooks:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. Pursuant to 40 CFR 156.10(a)(6) you must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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 FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). 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) lists 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, FIFRA section 12(a)(1)(B). 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 Assurance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, you may contact Joe Daniels via email at [daniels.joseph@epa.gov](mailto:daniels.joseph@epa.gov).



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

Enclosure

[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\*.**

**For use as a materials preservative against organisms that cause odor, stains, discoloration, deterioration or corrosion on surfaces.**

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

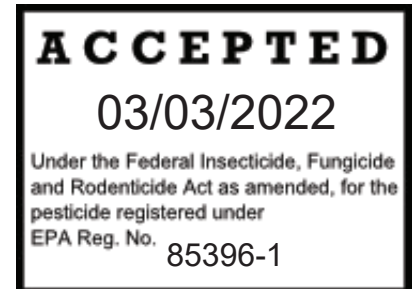
Bag Disposal: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into mixing container. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by the state and local authorities, by burning. If burned stay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

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

**\*Not for use on recreational vessels in CA**



[Optional Language in Brackets]

## **COPPERCOAT ANTI-FOUL**

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

### **ABN: COPPERCOAT DEFENSE ANTI-BACTERIAL**

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

For use as a Preservative and Bacteriostatic Agent for commercial and residential sites]

For use as a general anti-foulant 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 spray 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>	
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 a NIOSH approved particle mask.

### **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 dustpan 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.

This product is not for use on recreational vessels in CA

## COPPERCOAT MULTI-SEASON PERFORMANCE ANTI-FOULING

**FOR THE SUCCESSFUL APPLICATION OF COPPERCOAT MAKE SURE TO READ AND FOLLOW**

**THESE INSTRUCTIONS CAREFULLY**

**[Revision: Published February 10, 2022 ]**

Coppercoat anti-fouling is based on a water miscible epoxy resin, which is heavily loaded with pure grade (99%) fine copper powder .

### **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-part paint coatings or conventional anti-fouling. The best way to achieve this is sand or soda blasting, or with a non-toxic chemical paint remover. Finally, the hull must be sanded with 80 grit sandpaper to provide a good profile for the new epoxy coating. Remove the sanding dust before proceeding with the Coppercoat application – using either a soft brush or cloth. The hull can be washed with fresh water, making sure the surface is dry before proceeding. Under no circumstances, should you clean the hull with any solvents or oil-based products (such as Acetone or MEK).

**Fiberglass, gelcoat epoxy:** After sanding the hull (and removing the dust) Coppercoat can be applied, or if desired, an epoxy barrier coating may be applied first.

**Iron, Steel, Aluminum, Ferro-cement, Wood:** All can be successfully coated with Coppercoat. However, once these substrates have been sanded and cleaned, they must be coated with the appropriate epoxy barrier coat before proceeding with the Coppercoat application. Full instructions can be obtained from CoppercoatUSA, as well as appropriate epoxy barrier coatings, if desired.

### **Mixing:**

Mix Coppercoat one kit at a time. Coppercoat is supplied in three parts; Pack A (resin), Pack B (hardener), and a bag of fine copper powder. Mix Pack A with Pack B in an appropriately sized plastic mixing pot, then mix in Isopropyl Alcohol (91-99%) thinner, if using and then continue to mix while carefully adding the copper powder. Stir until all the parts are mixed together, with all the copper suspended in the epoxy; don't over mix.

**Note:** While in the mixing pot the copper may settle to the bottom of the mixing

pot; stir the mixture occasionally to suspend the copper. A NIOSH approved particle mask must be worn while mixing the copper into the epoxy.

**Pot Life:**

The average mixed pot life of Coppercoat is 30 minutes at 80 degrees Fahrenheit. Never mix more product than can easily be applied within the time available. Mix one kit of Coppercoat at a time.

**Thinning:**

Coppercoat should only be thinned with Isopropyl alcohol 91-99%. 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. Refer to CoppercoatUSA detailed instructions for additional information.

**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 moisture 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 1/8<sup>th</sup> inch foam rollers for epoxy 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. Note: We often use the term “tacky” in these instructions; the definition of “tacky” is when the Coppercoat has cured/dried enough that it does not come off on your finger if you touch it; it may still be soft enough to push your fingernail into it.

Under normal circumstances, Coppercoat is applied in four thin coats, wet-on-tacky. Second, third and fourth coats should be applied as soon as the previous coat allows – i.e. when the previous coat is tacky which is generally after approximately 30 minutes at 72 degrees Fahrenheit. The cure rate will be faster in warmer conditions and slower when it’s cool. To ensure a satisfactory chemical bond between coats, all the required coats should be applied consecutively in a single day.

If the vessel to be treated is too large to be painted with all four coats in one day by the workforce available, paint a manageable sized section - apply all four coats to this section from start to finish in one day, before proceeding with a further section at a later time. 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 thickness of copper is present. Never attempt to apply a coat too thickly as this will result in sagging and runs

**Sanding:**

It is necessary to sand the entire Coppercoat surface with 320 grit sandpaper to expose copper prior to launching. Although it takes 5 days for Coppercoat to fully cure, the coating will usually be cured enough to sand after 2-3 days; and it will be

much easier to sand at that time. If the coating “gums up” the sandpaper, wait a little longer before continuing. We recommend that a dust mask (at a minimum) be worn while sanding the Coppercoat.

**Coverage Rate**

**The effective coverage rate for a finished application is 42 square feet per 1.5 litre kit. Therefore, a hull that is 420 square feet will need 10 kits of Coppercoat in total**

**Shelf Life:**

Coppercoat is generally good for 12 months in the original sealed containers at 68 degrees Fahrenheit. Shelf life will be shortened if stored in warmer conditions. Keep protected from frost. If the copper powder is stored, seal it in an additional plastic sealing bag; any moisture will make the copper hard and unusable.

**Tool Cleaning:**

If the epoxy has not yet cured equipment can be cleaned in water. **Do not use white spirit, naphtha or methylated spirits.**

**Maintenance:**

Damaged areas can be touched up as required. Occasional cleaning to remove slime and prevent soft growth accumulation is generally required; depending on water temperature, salinity and other factors, some areas require more or less cleaning. Most people clean the hull with a piece of carpet or a squeegee or brush.

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



## **Directions For Use as a Materials Preservative**

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

Coppercoat Defense Anti-bacterial is a roller applied or spray-on preservative and bacteriostatic agent which inhibits the growth of mold, mildew, fungus and bacteria that cause odor, discoloration, staining, deterioration or corrosion of the coated surfaces. Coppercoat Defense Antibacterial also prevents slime mold accumulation on treated surfaces. It is a three-part system consisting of copper powder, a resin and a hardener applied on the surface and providing residual protections. Coppercoat can be used to protect any nonfood contact surface made of metal, ceramic, tile, fiberglass, plastic, wood and wallboard.

**This product is for nonfood contact surfaces only. This product is antibacterial for organisms that cause odor, stains, discoloration, deterioration or corrosion on surfaces.**

**No product treated with this product may make any public health claims relating to antibacterial activity without first obtaining an EPA registration for the product which permits such claims. No claim is made that this product protects users of any products listed below against food borne or disease-causing bacteria, viruses, germs or other disease-causing organisms.**

## **COPPERCOAT DEFENSE ANTI-BACTERIAL COATING**

### **FOR THE SUCCESSFUL APPLICATION OF COPPERCOAT DEFENSE ANTI-BACTERIAL COATING ON NON-EMERSION SURFACES READ AND FOLLOW THESE INSTRUCTIONS CAREFULLY**

**[Revision: Published February 28, 2022]**

Coppercoat Defense Anti-Bacterial Coating is based on a water miscible epoxy resin, which is heavily loaded with pure grade (99%) fine copper powder.

**Surface Preparation, Non-emersion:** As 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 Defense, must be applied to sound and permanent substrates - consequently all surfaces must be cleaned of any previously applied single-part paint. Under no circumstances, should you clean the surface with any solvents or oil-based products (such as Acetone or MEK).

Iron, Steel, Aluminum, ceramics, tile, wallboard, plastic, fiberglass and wood can be coated with Coppercoat Defense with proper surface preparation. Some surfaces will benefit from a coat of Coppercoat epoxy without the copper prior to applying the Coppercoat; review the following instructions for the substrate/surface to be coated.

**Note:** We often use the term “tacky” in these instructions; the definition of “tacky” is when the Coppercoat has cured/dried enough that it does not come off on your finger if you touch it; it can still be soft enough to push your fingernail into it.

## **Metal Surface Applications**

1. **Steel:** For application to steel surfaces in non-emersion service, make sure surface is clean and that no single part paints are on the surface; if so, remove them. The surface should be sanded with 40-60 grit sandpaper; remove all sanding dust before applying the Coppercoat Defense to the surface with a roller in 3 to 4 thin coats, wet-on-tacky, all in one day.
2. **Stainless Steel:** For application to stainless steel in non-emersion service, make sure the surface is clean and no single part paints are on the surface; if so, remove them. The surface needs to be sandblasted with black beauty or similar type of blast media, leaving a minimum of a 2-mil anchor profile. If unable to blast, use a MBX Bristol Blaster with SS tines, leaving a 2-mil anchor profile. Clean the surface before applying a tack-coat of Coppercoat epoxy without the copper, and then apply 3 to 4 coats of Coppercoat Defense to the surface wet-on-tacky, all in the same day.
3. **Aluminum:** For application to aluminum in non-emersion service, make sure the surface is clean and no single part paints are on the surface; if so, remove them. The surface needs to be sanded with 40-60 grit sandpaper; remove all sanding dust before applying the Coppercoat resin without copper in a thin coat, then apply 3 or 4 thin coats of Coppercoat Defense, all in one day, wet-on-tacky.

## **Non-Metal Surface Applications**

1. **Ceramics and Tile:** For application to ceramic tile make sure the surface is clean and no single part paints are on the surface; if so, remove them. The surface needs to be sanded well with 40-60 grit sandpaper; remove all sanding dust before applying 3 or 4 thin coats of Coppercoat Defense, all in one day, wet-on-tacky.
2. **Fiberglass and Plastic:** For application to fiberglass and plastic make sure the surface is clean and no single part paints are on the surface; if so, remove them. The surface needs to be sanded well with 80 grit sandpaper and then remove all sanding dust before applying 3 or 4 thin coats of Coppercoat Defense, wet-on-tacky, all in one day.
3. **Wood:** For application of wood the surface must be clean and free of any single part paint. Sand the surface with 80 grit sandpaper and remove all sanding dust before applying 3 or 4 thin coats of Coppercoat Defense, wet-on-tacky, all in one day.
4. **Wallboard:** Make sure the surface is clean. The surface needs to be sanded well with 80 grit sandpaper and then remove any sanding dust before applying 3 or 4 thin coats of Coppercoat Defense on the surface, wet-on-tacky, all in one day.

## **Mixing:**

**Mix Coppercoat Defense one kit at a time, and unless you are coating a large surface, mix partial batches** - see Partial Mixing, below. A kit of Coppercoat Defense consists of three parts: Pack A (resin), Pack B hardener), and a bag of fine copper powder.

Mix Pack A with Pack B in an appropriately sized plastic container, then continue to mix while carefully adding the copper powder. Stir until all the parts are mixed together, with all the copper suspended in the epoxy, but don't overmix. Note: While in the mixing pot, the copper may settle to the bottom of the mixing pot; stir the mixture occasionally to suspend the copper. A NIOSH approved particle mask must be worn while mixing the copper into the epoxy.

**Partial Mixing:**

It is often necessary to mix partial batches of Coppercoat Defense when the surface to be coated is less than 42 square feet or the workforce is less than 3 people. The mixing ratio is "1-part Resin, to 1-part Hardener, to .8-parts Copper powder".

**Pot Life:**

The average mixed pot life of Coppercoat Defense is 30 minutes at 80 degrees F. Never mix more product than can easily be applied within the time available.

**Thinning:**

Coppercoat Defense should only be thinned with Isopropyl Alcohol 91-99%. 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 Defense if the ambient or surface temperatures are below 48 degrees Fahrenheit. With the epoxy being water miscible until cured, protect the surface of the new Coppercoat Defense from all moisture for 48 hours or it will wash away.

**Application:**

The product should always be applied directly after mixing. Do not attempt to apply Coppercoat Defense by brush. For application by roller, 1/8<sup>th</sup> inch foam rollers for epoxy should be used (but not light duty cardboard-backed foam rollers). Coppercoat Defense can also be applied by conventional spray - please contact Coppercoat USA LLC for details.

Coppercoat Defense should be rolled on in four very thin coats. Second, third and fourth coats should be applied wet-on-tacky as soon as the previous coat allows – i.e. after approximately 30 minutes at 72 degrees Fahrenheit. To ensure a satisfactory chemical bond between coats, all the required coats should be applied consecutively in a single day.

On many projects, by the time the first coat has been completed, the start point is cured enough to apply the second coat, so the application of the Coppercoat Defense Coating is continuous. The cure rate will be faster in warmer conditions and slower in cooler conditions; if the Coppercoat Defense is still wet enough to come off on your finger or lifts when you roll on another coat, wait a little longer.

If the area to be treated is too large to be painted with all coats in one day by the workforce available, simply coat 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.

Always apply Coppercoat Defense in very thin coats; do not apply a coat too thickly, as this will result in sagging and runs and a rough surface.

**Sanding:**

After curing for 2-3 days sand the entire surface with 320 grit sandpaper to expose copper. Although it takes 5 days for Coppercoat Defense to fully cure, the coating will usually be cured enough to sand after 2-3 days; and it will be much easier to sand at that time. If the coating “gums up” the sandpaper, wait a little longer before continuing. A dust mask (at a minimum,) should be worn while sanding the Coppercoat Defense.)

**Coverage Rate:**

The coverage rate for a finished application of Coppercoat Defense is 42 square feet, per 1.5 liter kit. Therefore, a surface area of 420 square feet in area will need 10 kits of Coppercoat Defense Anti-Bacterial Coating.

**Shelf Life:**

12 months in sealed containers at 68 degrees Fahrenheit. Shelf life will be shortened if stored in warmer conditions. Keep protected from frost. If copper powder is stored, seal it in additional plastic sealing bags; any moisture will make the copper hard and unusable.

**Tool Cleaning:**

If the epoxy has not yet cured, equipment can be cleaned with water.

**Do not use white spirit, naphtha or methylated spirits.**

**Maintenance:**

Damaged areas can be touched up as required. Sand the area to be touched up with 80 grit sandpaper and apply more Coppercoat Defense Coating to that area in the same manner as described above for applications.

If you have questions about the use or application of Coppercoat Defense Anti-bacterial Coating, please contact **Coppercoat USA LLC at 1-321-514-9197** for further advice and information.

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