

86015-1

12/28/2010

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

DEC 28 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

ST Associates  
c/o Marlin, s.r.l  
5 Rogers Avenue  
Milford, CT 06460-6436

Attention: Pat Turley  
Regulatory Specialist

Subject: Velox Plus Antifouling White  
EPA Reg. No. 86015-1  
Notification Letter Dated November 29, 2010

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

- Minor changes to the labeling

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

If you have any questions concerning this letter, please contact Demson Fuller at (703) 308-8062.

Sincerely,

A handwritten signature in black ink that reads "Marshall Swindell".

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

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080. Approval expires 2-21



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number Marlin S.r.l. / 86015-1	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Marlin / VELOX PLUS Antifouling White	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Marlin S.r.l. Via Caduti sul Lavoro 4 34015 Muggia, TRIESTE, ITALY (see address of US agent in cover letter) <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.)

Use of extended content label (i.e., 2 ply fold-over booklet) to accommodate small container sizes and other minor changes described in attached page and marked-up, EPA-stamped draft label.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 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 violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, 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 type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input 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. No. per container	If "Yes" Package wgt. No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

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 Patricia A. Turley, Ph.D.	Title U.S. Agent / Regulatory Representative	Telephone No. (Include Area Code) 203-314-6096
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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 U.S. Agent / Regulatory Representative	6. Date Application Received (Stamped)
4. Typed Name Patricia A. Turley	5. Date Nov. 29, 2010	

November 29, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
Room S4900, 1 Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

**Attention:** Mr. Marshall Swindell  
PM 33, Antimicrobial Division

**Re:** Notification of minor label changes per PR Notice 98-10  
Product: Velox Plus Antifouling White  
Registration Number: 86015-1  
Service fee: not required for notification

Dear Mr. Swindell,

This notification is submitted on behalf of and at the request of Marlin, s.r.l.

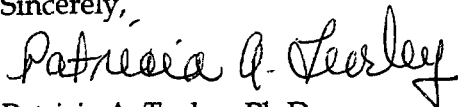
In accordance with PR Notice 98-10, we are notifying the EPA of minor label changes and the use of extended content labels, i.e., 2 ply fold-over labels. Expandable labels are needed to fit all EPA-required information onto the labels that are securely attached to two sizes of round paint cans: 8.45 and 16.9 fl. oz. Label sections that will be moved to the inside of the extended label as well as other minor changes are described in detail in the attachment to form 8570-1 and again on the EPA-stamped draft label. There are no changes involving the ingredients statement, signal word, precautionary, hazard and first aid statements, storage and disposal instructions, or directions for use.

The following information is enclosed:

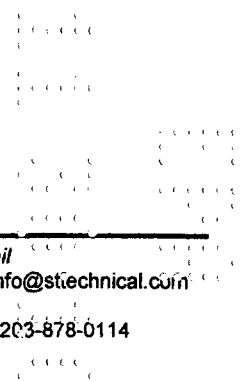
1. Form 8570-1 (Application form) plus attachment
2. EPA-stamped draft label marked up to show changes
3. EPA Letter showing that ST Technical Associates, LLC is Marlin's U.S. agent

Please feel free to contact me should more information be required or if there are any questions.

Sincerely,



Patricia A. Turley, Ph.D.  
U.S. Agent / Regulatory Representative for Marlin, s.r.l.  
ST Technical Associates, LLC  
5 Rogers Avenue  
Milford, CT 06460-5230  
Ph: 203-314-6096  
Fax: 203-878-0114  
Email: paturley@sttechnical.com



Outer Front side of 2-ply folded over label booklet

# Velox Plus Antifouling

**White**

①

Antifouling for

- ~~For~~ **propellers, stern drives and other underwater metallic parts**
- ~~Excellent adhesion and antifouling properties~~  
[Excellent Adhesion]

②

③

Active Ingredient:	
Zinc 2-Pyridinethiol 1-Oxide*.....	13.30%
Inert Ingredients:.....	86.70%
	100.00%
*zinc pyrithione	

KEEP OUT OF THE REACH OF CHILDREN

DANGER

NET CONTENTS: 8.45 fl. oz. (250 ml)

inside the label  
See side panel for First Aid and additional Precautionary Statements, Storage and Disposal instructions and Directions for Use

④

EPA Registration No.: 86015-xxxx  
EPA Establishment No.: 86015-ITA-001

Batch No. XXXXXXX

**Manufactured by:**  
 MARLIN, s.r.l.  
 Via Caduti sul Lavoro 4  
 34015 Muggia  
 TRIESTE, ITALY  
 Tel. +39 040 232588  
 Fax +39 040 232688  
 Email: information@marlinpaint.com

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- ① white is circled and moved to bottom of front panel,
- ② Product claim changed to: Antifouling for propellers, stern drives and other underwater metallic parts
- ③ Product claim [Excellent adhesion] is optional text as denoted by [ ]
- ④ Referral statement changed to refer reader to inside of label for First Aid, Precautionary, Storage & Disposal statements and Use Direction

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

## DANGER

**Corrosive.** Causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear goggles, face shield, or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.

**Residential (non-commercial) users** are advised to wear chemical resistant gloves, protective eyewear (goggles, safety glasses, or face shield), long-sleeved shirt and long pants, socks and shoes. ~~While removing existing paint by sanding or blasting, or applying new paint by brush or roller, it is advised to wear a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G), or a NIOSH approved full face respirator with an organic vapor removing cartridge with a P-100 filter.~~

**Commercial users** must wear a disposable coverall with hood, chemical resistant gloves, protective eyewear (goggles, safety glasses, or face shield), long-sleeved shirt and long pants, socks and chemical-resistant footwear. While removing existing paint by sanding or blasting, or applying new paint, user must wear a respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval number TC-14G), or a NIOSH approved full face respirator with an organic vapor removing cartridge with a P-100 filter.

**Environmental Hazards.** This pesticide is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water 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 containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your state water board or regional offices of the EPA. Do not apply directly to water by cleaning of equipment or disposal of wastes. Do not allow chips and dust generated during paint removal to enter water. Dispose of paint debris in an approved landfill. Wear protective clothing and supplied air respirator in accordance with the precautionary statements above when handling, painting or removing this paint.

**Physical or Chemical Hazards.** Combustible. Do not use or store near heat or open flame.

## FIRST AID

- IF IN EYES:**
  - Hold eye open and rinse slowly and gently for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.
  - Call a poison control center or doctor for treatment advice.
- IF SWALLOWED:**
  - Call a poison control center or doctor immediately for 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.
- IF ON SKIN OR CLOTHING:**
  - 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:**
  - 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.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

Have product container or label with you when calling a poison control center or doctor for treatment advice. For emergency information on this product, call the National Pesticides Information Center at 1-300-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the Poison Control Center at 1-800-222-1222.

outside back panel and inside of label

inside of 2 ply foldover label

807 0 2 2010  
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inside of a ply fold-over label

### DIRECTIONS FOR USE

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

VELOX PLUS ANTIFOULING WHITE is an antifouling coating for the control of barnacles, mussels, slime, algae, grasses and other marine and fresh-water fouling organisms. It is for use on propellers, stern drives and other underwater metallic parts of recreational and commercial vessels. It is not intended for use on hulls. This product may be applied by brush or spray (commercial users).

#### SURFACE PREPARATION

**STEEL OR BRONZE:** Remove any existing antifouling coating. Remove grease or oil stains from the propeller or metallic part using a fast degreasing solvent. Sand the metallic surface with rather coarse and sharp sandpaper (n. 80 - 100) or sandblast it. Then remove dust with a dry rag or with a brush. Do not touch the sanded surface with bare hands, as this may leave traces of grease which will impair adhesion of the product.

**ALUMINIUM OR LIGHT ALLOY:** Remove any existing antifouling coating. For new aluminum or light alloy parts that are already varnished with the original factory finish, degrease and sand with fine sandpaper. Bare aluminum must be treated with an appropriate epoxy coating, then sanded with fine sandpaper.

**MIXING:** Thoroughly mix before use, by shaking the can well in an upside down position for 2 minutes before opening. After opening, stir with a paddle to ensure that the paint is homogeneous.

**APPLICATION:** VELOX PLUS and its primer METAL PRIMER can be applied by brush or sprayer (commercial users only). Apply one light coat of METAL PRIMER. After allowing to dry for a minimum of 3 hours (70° F), apply 2-3 coats of VELOX PLUS waiting at least 3 hours (70° F) between each coat. Wait at least 16 hours before launching.

Apply VELOX PLUS only on METAL PRIMER or itself. Never apply VELOX PLUS or METAL PRIMER on other antifouling paints.

Theoretical coverage per coat: 450 square feet per gallon (11 square meters per liter).

**For application by residential (non-commercial) users:** Do not apply by airless sprayer. Apply only in outdoor, non-enclosed spaces.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Keep container closed when not in use. In case of spillage, absorb with inert material and dispose of in accordance with applicable regulations.

**Pesticide Disposal.** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency, or the hazardous waste representative at the nearest EPA regional office for guidance.

**Container Disposal.** Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. **Commercial Users:** Triple rinse container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer the container for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other approved state and local procedures.

For additional safety and handling information, refer to the MSDS and technical bulletin for this product.

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