

procedure is not scientifically justified due to lack of supporting DOC data for many saltwater toxicity tests used in the derivation, and is particularly not appropriate for the single abalone test on which the Draft Criteria are most affected. In California, where the mussels and abalone are native, it is common to have DOC values below 1 mg/L in natural seawater rather than over 2 mg/L. The low DOC is typically measured in dry, summer conditions in temperate regions like Southern California. Consequently, it is likely that toxicity tests with actual, and likely lower, DOC than that assumed by EPA would result in higher normalized effects concentrations and consequently higher Draft Criteria. The effects of this normalization on the resulting adjusted effects concentration is most obvious in the 50 most sensitive species tests.

**Recommendations:**

- All Granite Canyon and Scripps Pier water quality data inputs should be modified to represent accurate conditions for all tests conducted with these natural seawater sources.
- However, it is preferable that only toxicity tests paired with the actual water quality measurements (including DOC) should be included in the data set that is normalized to DOC to define the acute and chronic criteria using the saltwater BLM.
- The toxicity test data set that is modified by the BLM should only include species and test conditions known to occur in U.S. waters. Currently, the data set includes seawater samples from all over the world, many of which have very high DOC levels; these data are not relevant and further skew the normalization of the effects concentrations.

**Comment 3: Uncertainty in calculation of the ACR value results in an overly conservative chronic criterion for copper.**

The ACR of 3.022 was calculated as the geometric mean of the genus mean ACRs for five sensitive freshwater genera, *Ceriodaphnia* (3.268), *Daphnia* (4.057), *Oncorhynchus* (3.630), *Acipenser* (5.757), and *Cottus* (2.075), along with the two estuarine/marine genus mean ACRs for *Cyprinodon* (1.475) and *Brachionus* (1.229). Eliminating the freshwater species and using the two marine species to calculate the mean ACR changes the ACR from 3.02 to 1.35. When applied to the current abalone-based FAV of 3.94, it results in a final chronic criterion of 2.92 µg/L. This is a significant difference from the 1.3 µg/L that is currently proposed. This alternate chronic criterion (CCC) is predicted to be higher than the acute criterion (CMC) from the model, further illustrating the overly conservative model-predicted criteria.

**Recommendations:**

- Chronic criterion derivation should exclude freshwater species ACR data and only the actual values for the two estuarine/marine species should be used.
- Additional paired acute and chronic marine/estuarine toxicity tests should be conducted to support the development of a new, scientifically-based saltwater FACR.

**Comment 4: Confirmation that site specific objectives for copper derived through approved USEPA guidance will still be upheld.**

It is recognized by USEPA that the national criteria for dissolved metals including those for copper, lead, and zinc may be more or less protective than anticipated, depending on the site specific characteristics including diversity of aquatic life and water quality measurements (i.e., hardness, pH, dissolved organic matter, total suspended particulates, and concentrations of contaminants of concern) (USEPA, 1994). As a consequence, USEPA has developed the Water Effects Ratio (WER) as one of several procedures for deriving a site specific objectives.

**Recommendations:**

- Please confirm that studies conducted using EPA guidance<sup>4</sup> will still be supported by the EPA even if the results are not consistent with the revised national copper criteria.

**Summary:**

If all uncertainties indicated above are removed (i.e., remove single abalone test currently driving the Draft Criteria, normalizing based on more accurate DOC data—or not normalizing at all, and revising the saltwater FACR to a number based only on saltwater species), this would likely result in a lowered FAV similar to that used in 2003 of approximately 6.2 µg/L to protect the commercial Blue Mussel (*Mytilus edulis*), and an acute criterion of 3.1 µg/L (no change from 2003). Additional data would be needed to set and estimate an accurate saltwater FACR and a chronic criterion. Further support that the resulting criteria are overly conservative can be found in that the proposed standard is less than what the State of California considers to be background seawater concentrations for copper (California Ocean Plan<sup>5</sup>), where many of the species being protected thrive. In particular, we believe the Draft Criteria will be most difficult for enclosed bays and harbors, where circulation with ocean water is limited, and in arid regions where naturally low DOC occurs, like Southern California.

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<sup>4</sup> United States Environmental Protection Agency (USEPA). 1994. Interim Guidance on Determination and Use of Water-Effect Ratios for Metals. EPA-823-B-94-001. February.

<sup>5</sup> State Water Resources Control Board, 2012. *California Ocean Plan. Water Quality Control Plan. Ocean Waters of California*. Effective August 19, 2013. Adopted October 16, 2012. Resolution No. 2012-0056. Available from: [http://www.waterboards.ca.gov/water\\_issues/programs/ocean/docs/cop2012.pdf](http://www.waterboards.ca.gov/water_issues/programs/ocean/docs/cop2012.pdf).

# **ATTACHMENT 10**



# Department of Pesticide Regulation



Brian Leahy  
Director

## MEMORANDUM

Edmund G. Brown Jr.  
Governor

TO: Ann M. Prichard, Chief  
Pesticide Registration Branch

FROM: Carlos Gutierrez *[Original signed by C. Gutierrez]*  
Environmental Scientist  
Reevaluation Group

DATE: September 12, 2016 (Updated)

SUBJECT: LIST OF COPPER-BASED ANTIFOULANT PAINTS  
BY LEACH RATE CATEGORY

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The Department of Pesticide Regulation (DPR) placed copper-based antifouling paint (AFP) products, containing the active ingredients copper oxide, copper hydroxide, and cuprous thiocyanate into reevaluation in June 2010. DPR initiated this reevaluation based on elevated copper concentrations in salt water marinas that are primarily a result of extensive use of copper AFPs on boat hulls.

In October 2013, the Governor signed Assembly Bill (AB) 425 (Atkins) into law which states, "No later than February 1, 2014, the Department of Pesticide Regulation shall determine a leach rate for copper-based antifouling paint used on recreational vessels and make recommendations for appropriate mitigation measures that may be implemented to address the protection of aquatic environments from the effects of exposure to that paint if it is registered as a pesticide."

DPR determined the leach rate of each copper AFP product listed below based on the International Organization for Standardization (ISO) 10890:2010 method entitled, "Paints and Varnishes – Modeling of Biocides Release Rate from Antifouling Paints by Mass Balance Calculation." DPR calculates a final daily mean copper release rate using this data and an established adjustment factor for comparison to actual environmental leach rates. Previously, the products were divided into three categories. However, after discussions with stakeholders and accounting for enforcement challenges, DPR determined establishing a single maximum allowable leach rate would be the most effective way to reduce copper in California waters. Copper AFP products are categorized based on the following criteria:

- Category I:** Products with a leach rate below or equal to ( $\leq$ )  $9.5 \mu\text{g}/\text{cm}^2/\text{day}$
- Category II:** Products with a leach rate above ( $>$ )  $9.5 \mu\text{g}/\text{cm}^2/\text{day}$  or no leach rate data on file with DPR



Products are listed alphabetically by brand name within each leach rate category. Changes to the August 12, 2015 version of the list are highlighted in orange. If a product was only recently registered or the product is not currently registered, it may not appear on the list below.

**Category I: Actively registered copper AFP products with leach rates below or equal to 9.5 µg/cm<sup>2</sup>/day. Product count = 88**

Product Name	Registration Number	Registrant
4054 VINYL ANTIFOULING PAINT, BLACK MIL-P-15931F,TYPE II, CLASS 2 FORMULA 129A	2693- 56-ZA	INTERNATIONAL PAINT LLC
ABC 4 MARINE ANTIFOULING PAINT	7313- 12-AA	PPG ARCHITECTURAL FINISHES INC.
ACT WITH SLIME FIGHTER	2693- 227-AA	INTERNATIONAL PAINT LLC
ANTIFOULING SEAFORCE 200 AV BLACK 3GE099	2568- 93-ZF	JOTUN PAINTS INC.
ANTIFOULING SEAFORCE 200 AV BLUE 3GEBLU	2568- 93-ZG	JOTUN PAINTS INC.
ANTIFOULING SEAFORCE 200 AV DARK RED 3GEDRD	2568- 93-ZE	JOTUN PAINTS INC.
AQUAGARD WATERBASE ANTIFOULING BOTTOM BOAT PAINT	9339- 19-AA-70383	FLEXDEL CORPORATION
CALIFORNIA BOTTOMKOTE	2693- 18-ZA	INTERNATIONAL PAINT LLC
EPOXYCOP	2693- 70-ZA	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL	2693- 183-ZC	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE CLASSIC	2693- 18-ZB	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE NT	2693- 228-AA	INTERNATIONAL PAINT LLC
HEMPEL'S GLOBIC 81920	10250- 56-AA	HEMPEL COATINGS (USA) INC.
HEMPEL'S GLOBIC 81950	10250- 55-AA	HEMPEL COATINGS (USA) INC.
INTERCLEN 140 MODIFIED VINYL ANTIFOULING BWA360 RED	2693- 178-ZA	INTERNATIONAL PAINT LLC
INTERCLEN 229 BCA449 A/F RED	2693- 60-ZA	INTERNATIONAL PAINT LLC
INTERCLEN 229 BCA779 A/F BLACK	2693- 60-ZB	INTERNATIONAL PAINT LLC
INTERCLEN 245 NA BRA570 RED	2693- 132-ZX	INTERNATIONAL PAINT LLC
INTERCLEN 245 NA BRA572 BLACK	2693- 132-ZW	INTERNATIONAL PAINT LLC
INTERCLEN 5170 ANTIFOULING BLACK BCA 172/5	2693- 176-ZA	INTERNATIONAL PAINT LLC
INTERCLEN 5170 ANTIFOULING RED BCA 170/5	2693- 176-AA	INTERNATIONAL PAINT LLC
INTERSPEED 6200NA ANTIFOULING BLACK BQA659/5GL	2693- 176-ZB	INTERNATIONAL PAINT LLC
INTERSPEED 6200NA ANTIFOULING RED BQA654/5GL	2693- 176-ZC	INTERNATIONAL PAINT LLC
INTERSPEED 640 POLISHING ANTIFOULING BRA640 RED	2693- 142-ZL	INTERNATIONAL PAINT LLC
INTERSPEED 640 POLISHING ANTIFOULING BRA641 BLUE	2693- 142-ZO	INTERNATIONAL PAINT LLC
INTERSPEED 640 POLISHING ANTIFOULING BRA642 BLACK	2693- 142-ZM	INTERNATIONAL PAINT LLC



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Product Name	Registration Number	Registrant
INTERSPEED 640 POLISHING ANTIFOULING BRA643 GREEN	2693- 142-ZN	INTERNATIONAL PAINT LLC
INTERSPEED 640 POLISHING ANTIFOULING BRA644 OCEAN GRAY	2693- 142-ZK	INTERNATIONAL PAINT LLC
INTERSPEED 6400NA BLACK BQA679/5GL	2693- 132-ZY	INTERNATIONAL PAINT LLC
INTERSPEED 6400NA RED BQA674/5GL	2693- 132-ZZ	INTERNATIONAL PAINT LLC
MICRON 66 YBA470 BLUE	2693- 187-ZD	INTERNATIONAL PAINT LLC
MICRON 66 YBA471 GREEN	2693- 187-ZF	INTERNATIONAL PAINT LLC
MICRON 66 YBA472 RED	2693- 187-ZE	INTERNATIONAL PAINT LLC
MICRON 66 YBA473 BLACK	2693- 187-ZG	INTERNATIONAL PAINT LLC
MICRON CSC HS	2693- 225-AA	INTERNATIONAL PAINT LLC
MICRON EXTRA VOC 5790 BLUE	2693- 190-ZI	INTERNATIONAL PAINT LLC
MICRON EXTRA VOC 5791 GREEN	2693- 190-ZH	INTERNATIONAL PAINT LLC
MICRON EXTRA VOC 5792 RED	2693- 190-ZG	INTERNATIONAL PAINT LLC
MICRON EXTRA VOC 5793 BLACK	2693- 190-ZJ	INTERNATIONAL PAINT LLC
MICRON EXTRA VOC 5794 SHARK WHITE	2693- 190-ZK	INTERNATIONAL PAINT LLC
PETTIT HYDROCOAT SR DUAL-BIocide ABLATIVE ANTIFOULING	60061- 136-AA	KOP-COAT, INC.
PETTIT MARINE PAINT ANTIFOULING PAINT FOR INFLATABLE BOATS	60061- 87-ZM	KOP-COAT, INC.
PETTIT MARINE PAINT HORIZONS ABLATIVE ANTIFOULING BOTTOM PAINT	60061- 101-AA	KOP-COAT, INC.
PETTIT MARINE PAINT HYDROCOAT ABLATIVE ANTIFOULING PAINT 1240 BLUE	60061- 87-ZH	KOP-COAT, INC.
PETTIT MARINE PAINT HYDROCOAT ABLATIVE ANTIFOULING PAINT 1340 GREEN	60061- 87-ZJ	KOP-COAT, INC.
PETTIT MARINE PAINT HYDROCOAT ABLATIVE ANTIFOULING PAINT 1640 RED	60061- 87-ZL	KOP-COAT, INC.
PETTIT MARINE PAINT HYDROCOAT ABLATIVE ANTIFOULING PAINT 1840 BLACK	60061- 87-ZI	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD PRO ANTIFOULING BOTTOM PAINT	60061- 94-ZB	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD SR ANTIFOULING BOTTOM PAINT	60061- 94-ZD	KOP-COAT, INC.
PETTIT MARINE PAINT ULTIMA SR 40 ANTIFOULING BOTTOM PAINT	60061- 117-ZB	KOP-COAT, INC.
PETTIT MARINE PAINT ULTIMA SSA ANTIFOULING PAINT	60061- 71-ZB	KOP-COAT, INC.
PETTIT MARINE PAINT VIVID ANTIFOULING PAINT	60061- 116-AA	KOP-COAT, INC.
PETTIT NEPTUNE 5 HARD HYBRID ABLATIVE	60061- 142-AA	KOP-COAT, INC.



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ANTIFOULING PAINT		
PETTIT ULTIMA SR-40 ANTIFOULING PAINT	60061- 101-ZC	KOP-COAT, INC.
RUST-OLEUM MARINE COATINGS BOAT BOTTOM ANTIFOULING PAINT	60061- 63-AA-69587	RUST-OLEUM CORPORATION
RUST-OLEUM MARINE COATINGS BOAT BOTTOM ANTIFOULING PAINT	60061- 63-AA-7033	RUST-OLEUM CORPORATION
SEA HAWK AF33	44891- 12-AA	NEW NAUTICAL COATINGS, INC.
SEA HAWK SHARKSKIN ANTIFOULING PAINT	44891- 11-AA	NEW NAUTICAL COATINGS, INC.
SIGMA ECOFLEET 238	7313- 12-ZA	PPG ARCHITECTURAL FINISHES INC.
SIGMA ECOFLEET 530	7313- 24-AA	PPG ARCHITECTURAL FINISHES INC.
SUPER PROGUARD BLACK NAU773	23566- 20-ZT	INTERNATIONAL PAINT, LLC
SUPER PROGUARD BLUE NAU770	23566- 20-ZR	INTERNATIONAL PAINT, LLC
SUPER PROGUARD RED NAU772	23566- 20-ZS	INTERNATIONAL PAINT, LLC
TRILUX 33 ANTIFOULING	2693- 226-AA	INTERNATIONAL PAINT LLC
TRILUX 33 YBA060 BLUE	2693- 203-AA	INTERNATIONAL PAINT LLC
TRILUX 33 YBA061 GREEN	2693- 203-ZD	INTERNATIONAL PAINT LLC
TRILUX 33 YBA062 RED	2693- 203-ZA	INTERNATIONAL PAINT LLC
TRILUX 33 YBA063 BLACK	2693- 203-ZB	INTERNATIONAL PAINT LLC
TRILUX 33 YBA068 WHITE	2693- 203-ZC	INTERNATIONAL PAINT LLC
TRI-LUX II AEROSOL 493A BLACK	2693- 174-ZC	INTERNATIONAL PAINT LLC
TRI-LUX II AEROSOL 498A WHITE	2693- 174-ZA	INTERNATIONAL PAINT LLC
TRI-LUX III WITH BIO-LUX 5490 BLUE	2693- 181-AA	INTERNATIONAL PAINT LLC
TRILUX PROP & DRIVE 5493A BLACK	2693- 199-AA	INTERNATIONAL PAINT LLC
TRILUX PROP & DRIVE 5494A GRAY	2693- 199-ZB	INTERNATIONAL PAINT LLC
TRILUX PROP & DRIVE 5498A WHITE	2693- 199-ZA	INTERNATIONAL PAINT LLC
TRILUX PROP & DRIVE 5499A CLEAR	2693- 199-ZC	INTERNATIONAL PAINT LLC
ULTRA	2693- 212-AA	INTERNATIONAL PAINT LLC
WEST MARINE ANTIFOULING OUTDRIVE SPRAY PAINT 5566252 BLACK	2693- 174-ZD	INTERNATIONAL PAINT LLC
WEST MARINE BOTTOM SHIELD ANTIFOULING PAINT EASY APPLICATION & CLEAN-UP TECHNOLOGY	60061- 135-AA	KOP-COAT, INC.
WEST MARINE BOTTOMPRO GOLD! PROFESSIONAL ANTIFOULING BOTTOM PAINT	60061- 117-ZE	KOP-COAT, INC.
WEST MARINE BOTTOMSHIELD ANTIFOULING PAINT	60061- 129-AA	KOP-COAT, INC.

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COMPOSITE COPPER TECHNOLOGY		
WEST MARINE CPP ABLATIVE ANTIFOULING PAINT COMPOSITE COPPER TECHNOLOGY	60061- 132-AA	KOP-COAT, INC.
WEST MARINE CPP PLUS! ABLATIVE ANTIFOULING PAINT	60061- 71-ZD	KOP-COAT, INC.
WEST MARINE PCA GOLD! ABLATIVE ANTIFOULING PAINT	60061- 101-ZB	KOP-COAT, INC.
WEST MARINE PCA GOLD! PREMIUM ABLATIVE ANTIFOULING PAINT	60061- 117-ZD	KOP-COAT, INC.
WOOLSEY YACHT SHIELD ABLATIVE ANTIFOULING BOTTOM PAINT	60061- 101-ZA	KOP-COAT, INC.
WOOLSEY YACHT SHIELD SF ABLATIVE ANTIFOULING BOTTOM PAINT	60061- 117-ZA	KOP-COAT, INC.
Z*SPAR BOTTOM PRO GOLD ANTIFOULING BOTTOM PAINT	60061- 94-ZE	KOP-COAT, INC.



**Category II: Actively registered copper AFP products with a leach rate above (>) 9.5 µg/cm<sup>2</sup>/day or no leach rate data on file with DPR. Product count = 117**

Product Name	Registration Number	Registrant
4050 VINYL ANTIFOULING PAINT, RED MIL-P-15931F,TYPE I, CLASS 2 FORMULA 121A	2693- 46-ZA	INTERNATIONAL PAINT LLC
ABC 3 MARINE ANTIFOULING PAINT	7313- 18-ZB	PPG ARCHITECTURAL FINISHES INC.
ABC MARINE ANTIFOULING PAINT	7313- 18-AA	PPG ARCHITECTURAL FINISHES INC.
AMERCOAT 214 MARINE ANTIFOULING PAINT	7313- 13-AA	PPG ARCHITECTURAL FINISHES INC.
AWLGRIP AWLSTAR GOLD LABEL ANTIFOULING BP201 CHARCOAL BLACK	41750- 1-ZE	INTERNATIONAL PAINT, LLC
AWLGRIP AWLSTAR GOLD LABEL ANTIFOULING BP401 MEDIUM GREEN	41750- 1-ZA	INTERNATIONAL PAINT, LLC
AWLGRIP AWLSTAR GOLD LABEL ANTIFOULING BP501 LIGHT BLUE	41750- 1-ZB	INTERNATIONAL PAINT, LLC
AWLGRIP AWLSTAR GOLD LABEL ANTIFOULING BP502 DEEP BLUE	41750- 1-ZD	INTERNATIONAL PAINT, LLC
AWLGRIP AWLSTAR GOLD LABEL ANTIFOULING BP701 RED	41750- 1-ZC	INTERNATIONAL PAINT, LLC
AWLGRIP AWLSTAR HS GOLD LABEL ANTIFOULING	2693- 70-ZB	INTERNATIONAL PAINT LLC
BIOCOP TF	44891- 15-AA	NEW NAUTICAL COATINGS, INC.
BOTTOMKOTE	2693- 12-ZA	INTERNATIONAL PAINT LLC
BOTTOMKOTE PRO	23566- 6-AA	INTERNATIONAL PAINT, LLC
EPOXYCOP ABLATIVE K70 RED	23566- 19-ZY	INTERNATIONAL PAINT, LLC
EPOXYCOP ABLATIVE K75 BLUE	23566- 19-ZW	INTERNATIONAL PAINT, LLC
EPOXYCOP ABLATIVE K76 BLACK	23566- 19-ZX	INTERNATIONAL PAINT, LLC
EPOXYCOP K50 RED	2693- 62-ZP	INTERNATIONAL PAINT LLC
EPOXYCOP K51 BLUE	2693- 62-ZQ	INTERNATIONAL PAINT LLC
EPOXYCOP K52 BLACK	2693- 62-ZR	INTERNATIONAL PAINT LLC
EPOXYCOP K53 GREEN	2693- 62-ZS	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE	2693- 62-ZO	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-4490B RED	2693- 209-ZA	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-5590B GREEN	2693- 209-ZF	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-6690B BLUE	2693- 209-AA	INTERNATIONAL PAINT LLC

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FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-6696B DARK BLUE	2693- 209-ZB	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-7740B GRAY WHITE	2693- 209-ZC	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-7790B BLACK	2693- 209-ZD	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE ACT WITH IRGAROL-8890B BROWN	2693- 209-ZE	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE AQUA YBA549 RED	2693- 172-AA	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE AQUA YBA559 GREEN	2693- 172-ZC	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE AQUA YBA579 BLACK	2693- 172-ZB	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE WITH IRGAROL-449B RED	2693- 208-ZC	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE WITH IRGAROL-559B GREEN	2693- 208-ZA	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE WITH IRGAROL-669B BLUE	2693- 208-AA	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE WITH IRGAROL-779B BLACK	2693- 208-ZB	INTERNATIONAL PAINT LLC
FIBERGLASS BOTTOMKOTE AQUA YBA569 BLUE	2693- 172-ZA	INTERNATIONAL PAINT LLC
FLEXGARD XI WATERBASE PRESERVATIVE COPPER PAINT	9339- 19-ZA	FLEXABAR CORPORATION
HEMPEL'S ANTIFOULING OLYMPIC HI 76600-19990 BLACK	10250- 54-ZA	HEMPEL COATINGS (USA) INC.
HEMPEL'S ANTIFOULING OLYMPIC HI 76600-30240 BRIGHT BLUE	10250- 54-ZC	HEMPEL COATINGS (USA) INC.
HEMPEL'S ANTIFOULING OLYMPIC HI 76600-50300 LIGHT RED	10250- 54-ZB	HEMPEL COATINGS (USA) INC.
HEMPEL'S ANTIFOULING OLYMPIC HI 76600-51110 RED	10250- 54-AA	HEMPEL COATINGS (USA) INC.
INTERSMOOTH 360 ANTIFOULING DARK BROWN BEA368/5	2693- 187-ZH	INTERNATIONAL PAINT LLC
INTERSMOOTH 360 ANTIFOULING DARK RED BEA369/5	2693- 187-ZI	INTERNATIONAL PAINT LLC
INTERSMOOTH 460 ANTIFOULING BLACK BEA461/5	2693- 187-ZL	INTERNATIONAL PAINT LLC
INTERSMOOTH 460 ANTIFOULING BLUE BEA462/5	2693- 187-ZM	INTERNATIONAL PAINT LLC
INTERSMOOTH 460 ANTIFOULING DARK BROWN BEA468/5	2693- 187-ZJ	INTERNATIONAL PAINT LLC
INTERSMOOTH 460 ANTIFOULING DARK RED BEA469/5	2693- 187-ZK	INTERNATIONAL PAINT LLC
MICRON CSC	2693- 132-ZV	INTERNATIONAL PAINT LLC
MICRON EXTRA 5690 BLUE	2693- 190-ZF	INTERNATIONAL PAINT LLC
MICRON EXTRA 5691 GREEN	2693- 190-ZB	INTERNATIONAL PAINT LLC
MICRON EXTRA 5692 RED	2693- 190-ZD	INTERNATIONAL PAINT LLC
MICRON EXTRA 5693 BLACK	2693- 190-ZC	INTERNATIONAL PAINT LLC
MICRON EXTRA 5694 SHARK WHITE	2693- 190-ZE	INTERNATIONAL PAINT LLC

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MICRON EXTRA 5695 BROWN	2693- 190-AA	INTERNATIONAL PAINT LLC
MICRON EXTRA 5696 DARK BLUE	2693- 190-ZA	INTERNATIONAL PAINT LLC
MICRON OPTIMA BASE PART A OF A TWO PART ANTIFOULING PAINT SYSTEM	2693- 193-AA	INTERNATIONAL PAINT LLC
PETTIT MARINE PAINT TRINIDAD ANTI-FOULING 1275 BLUE	60061- 49-ZA	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD ANTI-FOULING 1675 RED	60061- 50-ZA	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD ANTIFOULING 1875 BLACK	60061- 49-ZJ	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD VOC ANTIFOULING BOTTOM PAINT (1678 RED)	60061- 50-ZD	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD VOC ANTIFOULING BOTTOM PAINT 1278 BLUE	60061- 49-ZD	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD VOC ANTIFOULING BOTTOM PAINT 1378 GREEN	60061- 49-ZE	KOP-COAT, INC.
PETTIT MARINE PAINT TRINIDAD VOC ANTIFOULING BOTTOM PAINT 1878 BLACK	60061- 49-ZF	KOP-COAT, INC.
PETTIT MARINE PAINT UNEPOXY TIN-FREE ANTIFOULING 1628 RED	60061- 64-AA	KOP-COAT, INC.
PETTIT TRINIDAD PRO ANTIFOULING PAINT	60061- 49-ZM	KOP-COAT, INC.
PETTIT TRINIDAD SR ANTIFOULING PAINT	60061- 49-ZN	KOP-COAT, INC.
PETTIT ULTIMA SR 60	60061- 94-ZC	KOP-COAT, INC.
PETTIT ULTIMA SR-60 ANTIFOULING PAINT	60061- 49-ZK	KOP-COAT, INC.
PROGUARD ABLATIVE BLACK NAU993	2693- 142-ZR	INTERNATIONAL PAINT LLC
PROGUARD ABLATIVE BLUE NAU990	2693- 142-ZP	INTERNATIONAL PAINT LLC
PROGUARD ABLATIVE RED NAU992	2693- 142-ZQ	INTERNATIONAL PAINT LLC
PROGUARD BLACK NAU883	23566- 19-AC	INTERNATIONAL PAINT, LLC
PROGUARD BLUE NAU880	23566- 19-ZZ	INTERNATIONAL PAINT, LLC
PROGUARD RED NAU882	23566- 19-AB	INTERNATIONAL PAINT, LLC
PRO-LINE COMMERCIAL MARINE FINISHES VINYL COPPER ANTIFOULING PAINT 1088C-01 BLUE	577- 550-ZJ	SHERWIN-WILLIAMS COMPANY, THE/ THE CUPRINOL GROUP/
PRO-LINE COMMERCIAL MARINE FINISHES VINYL COPPER ANTIFOULING PAINT 1088C-02 BLACK	577- 551-ZC	SHERWIN-WILLIAMS COMPANY, THE/ THE CUPRINOL GROUP/
PRO-LINE COMMERCIAL MARINE FINISHES VINYL COPPER ANTIFOULING PAINT 1088C-03 RED	577- 550-ZM	SHERWIN-WILLIAMS COMPANY, THE/CUPRINOL GROUP/



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PRO-LINE COMMERCIAL MARINE FINISHES VINYL COPPER ANTIFOULING PAINT 1088C-07 LIGHT BLUE	577- 550-ZN	SHERWIN-WILLIAMS COMPANY, THE/CUPRINOL GROUP/
PRO-LINE MARINE FINISHES VINYL COPPER ANTIFOULING PAINT Y1088C-01 BLUE	577- 550-ZE	SHERWIN-WILLIAMS COMPANY, THE/ THE CUPRINOL GROUP/
PRO-LINE MARINE FINISHES VINYL COPPER ANTIFOULING PAINT Y1088C-02 BLACK	577- 551-ZB	SHERWIN-WILLIAMS COMPANY, THE/ THE CUPRINOL GROUP/
REGATTA BALTOPLATE RACING FINISH R3950 GRAY METALLIC	2693- 148-ZE	INTERNATIONAL PAINT LLC
SEA HAWK CUKOTE ANTI-FOULING COATING	44891- 7-AA	NEW NAUTICAL COATINGS, INC.
SEA HAWK MONTEREY WATER BORNE ANTIFOULING COATING	44891- 9-AA	NEW NAUTICAL COATINGS, INC.
SEA HAWK SINGLE SEASON PROTECTION TALON	44891- 12-ZA	NEW NAUTICAL COATINGS, INC.
SEA HAWK TROPIKOTE ANTI-FOULING BOTTOM PAINT	44891- 10-AA	NEW NAUTICAL COATINGS, INC.
SEAGUARD ABLATIVE ANTI-FOULANT COATING	10250- 54-AA-577	SHERWIN-WILLIAMS COMPANY, THE/ THE CUPRINOL GROUP/
SUPER ABLATIVE WITH SLIME FIGHTER - K64B GREEN	2693- 209-ZY	INTERNATIONAL PAINT LLC
SUPER ABLATIVE WITH SLIME FIGHTER-K60B RED	2693- 209-ZG	INTERNATIONAL PAINT LLC
SUPER ABLATIVE WITH SLIME FIGHTER-K61B BLUE	2693- 209-ZH	INTERNATIONAL PAINT LLC
SUPER ABLATIVE WITH SLIME FIGHTER-K62B BLACK	2693- 209-ZI	INTERNATIONAL PAINT LLC
SUPER EPOXYCOP ABLATIVE K60 RED	23566- 20-ZO	INTERNATIONAL PAINT, LLC
SUPER EPOXYCOP ABLATIVE K61 BLUE	23566- 20-ZQ	INTERNATIONAL PAINT, LLC
SUPER EPOXYCOP ABLATIVE K62 BLACK	23566- 20-ZP	INTERNATIONAL PAINT, LLC
SUPER EPOXYCOP ABLATIVE K64 GREEN	23566- 20-ZN	INTERNATIONAL PAINT, LLC
SUPER KL K90 RED	67543- 7-ZI	INTERNATIONAL PAINT, LLC
SUPER KL K91 BLUE	67543- 7-ZJ	INTERNATIONAL PAINT, LLC
SUPER KL K93 BLACK	67543- 7-ZK	INTERNATIONAL PAINT, LLC
SUPER KL K94 GREEN	67543- 7-ZH	INTERNATIONAL PAINT, LLC
SUPER KL WITH SLIME FIGHTER - K94B GREEN	2693- 213-ZC	INTERNATIONAL PAINT LLC
SUPER KL WITH SLIME FIGHTER-K90B RED	2693- 213-AA	INTERNATIONAL PAINT LLC
SUPER KL WITH SLIME FIGHTER-K91B BLUE	2693- 213-ZA	INTERNATIONAL PAINT LLC
SUPER KL WITH SLIME FIGHTER-K93B BLACK	2693- 213-ZB	INTERNATIONAL PAINT LLC
ULTRA 3449 RED	2693- 192-ZA	INTERNATIONAL PAINT LLC



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<b>Product Name</b>	<b>Registration Number</b>	<b>Registrant</b>
ULTRA 3559 GREEN	2693- 192-ZC	INTERNATIONAL PAINT LLC
ULTRA 3669 BLUE	2693- 192-ZB	INTERNATIONAL PAINT LLC
ULTRA 3779 BLACK	2693- 192-AA	INTERNATIONAL PAINT LLC
ULTRA-KOTE	2693- 119-ZD	INTERNATIONAL PAINT LLC
ULTRA-KOTE 2449H RED	2693- 144-AA	INTERNATIONAL PAINT LLC
ULTRA-KOTE 2669N BLUE	2693- 135-ZF	INTERNATIONAL PAINT LLC
ULTRA-KOTE 2779N BLACK	2693- 135-ZH	INTERNATIONAL PAINT LLC
VC-OFFSHORE TEFLON ANTIFOULING SALTWATER FORMULA	2693- 148-ZD	INTERNATIONAL PAINT LLC
WOOLSEY DEFENSE CA	60061- 49-ZO	KOP-COAT, INC.
Z*SPAR THE PROTECTOR VOC HARD TYPE ANTIFOULING PAINT B-90 RED	60061- 50-ZE	KOP-COAT, INC.
Z*SPAR THE PROTECTOR VOC HARD TYPE ANTIFOULING PAINT B-91 BLUE	60061- 49-ZG	KOP-COAT, INC.
Z*SPAR THE PROTECTOR VOC HARD TYPE ANTIFOULING PAINT B-93 GREEN	60061- 49-ZI	KOP-COAT, INC.
Z*SPAR THE PROTECTOR VOC HARD TYPE ANTIFOULING PAINT B-94 BLACK	60061- 49-ZH	KOP-COAT, INC.
Z-SPAR BOTTOM PRO GOLD! ANTIFOULING PAINT	60061- 49-ZL	KOP-COAT, INC.