



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 8, 2017

Alexis Chapman  
The Dow Chemical Company  
100 Larkin Center  
Midland, MI 48674

Subject: Label Amendment – Modify Oil and Gas Production Uses Product  
Name: TRIS NITRO™ Brand of 25% Aqueous  
Tris(hydroxymethyl) Nitromethane Industrial Bacteriostat  
EPA Registration Number: 464-668  
Application Date: December 21, 2016  
Decision Number: 525285

Dear Ms. Chapman:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, 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. 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 the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. 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) list 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. 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 Compliance.

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

Page 2 of 2  
EPA Reg. No. 464-668  
Decision No. 525285

with FIFRA section 6. If you have any questions, please contact Terria Northern by phone at 703-347-0265, or via email at [northern.terria@epa.gov](mailto:northern.terria@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert" with a stylized flourish at the end.

John Hebert, Chief  
Regulatory Management Branch I  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

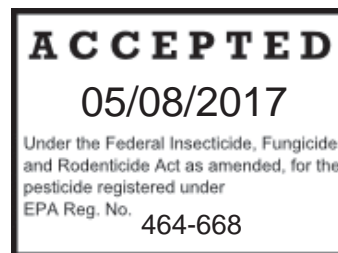
Enclosure: Stamped label

TRIS NITRO 25%  
 Master Label  
 December 21, 2016

**TRIS NITRO™**  
**Brand of 25% Aqueous Tris(hydroxymethyl) Nitromethane Industrial Bacteriostat**

Active Ingredient: 2-Hydroxymethyl-2-nitro-1,3-propanediol ..... 25.75%  
 Inert Ingredients..... 74.25%  
 Total 100%

E.P.A. Registration No. 464-668  
 E.P.A. Est. XXXX-XX-X



**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

<b>FIRST AID</b>	
<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> </ul>
<b>IF ON SKIN:</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 and then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eyes open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continuing rinsing eyes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
IN CASE OF AN EMERGENCY endangering life or property involving this product, call collect (989) 636-4400	

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN OR INHALED. CAUSES MODERATE EYE IRRITATION.

Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or 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 containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

TRIS NITRO 25%  
Master Label  
December 21, 2016

## **STORAGE AND DISPOSAL**

**STORAGE:** Freezes at 0° C. Store in a warm place.

TRIS NITRO decomposes in the presence of alkaline materials. Protect from vapors of ammonia and amines during the handling and storage to prevent deterioration and release of formaldehyde.

### **PESTICIDE DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or any approved waste disposal facility.

### **CONTAINER DISPOSAL**

*Option to use for labels on nonrefillable rigid containers of all sizes*

**Nonrefillable Container:** Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

*Option to use on labels on refillable rigid tote containers*

**Refillable Container:** Refill this container with pesticide only. Do not use this container for any other purpose. Cleaning of the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean container before final disposal, empty contents into application equipment and triple rinse. Pour or pump rinsate into application equipment or rinsate collection system. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, by other procedures allowed by state and local authorities.

### **DIRECTIONS FOR USE**

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

### **USE IN RECIRCULATING WATER SYSTEMS**

For control of bacteria in industrial cooling towers and evaporative condensers, and closed recirculating water systems such as retort, rotary or hydrostatic heat sterilization processes used in the food industry. Treat the system with 5-1000 ppm of active TRIS NITRO.

**Initial Dose:** When the system is noticeably fouled, add 12 oz - 2 gallon of this product per 1000 gallons of water (28.6-610 ppm active ingredient) in the system. Repeat until control is achieved. Badly fouled systems must be cleaned before initial treatment.

**Subsequent Dose:** Add 4 oz - 2 quart of this product (9.5-152 ppm active ingredient) per 1000 gallons of water in the system as needed to maintain control.

TRIS NITRO should be added at a convenient point which will provide uniform mixing.

### **USE IN OIL AND GAS PRODUCTION**

At a point of uniform mixing, apply Tris Nitro™ 25% Aqueous Antimicrobial Agent at a concentration within the stated dosing range for the relevant product application. Subsequent treatments can be applied, as needed, to maintain an effective microbial control concentration, within the described dosage range. The stated concentration ranges provide microbial control of microorganisms at differing levels of contamination.

### **WATER FLOODS and ENHANCED OIL RECOVERY FLUIDS**

Intermittent or continuous dosing can be applied to the fluid to achieve a concentration of 200 to 2800 ppm product for effective microbial control.

### **FRACTURING FLUIDS**

Add 300 to 2800 ppm product at any point in the production or application of the fracturing fluid to reduce bacterial contamination and fracturing fluid degradation.

### **DRILLING, COMPLETION, AND WORKOVER FLUIDS**

TRIS NITRO 25%  
Master Label  
December 21, 2016

Add this product to a drilling fluid system at a point of uniform mixing such as the circulating mud tank. Add 300 to 2800 ppm product to the freshly-prepared fluid system. Subsequent treatments may be applied, as needed, to maintain a concentration of 300 to 2800 ppm due to fluid reuse or turn over.

#### **PACKER FLUIDS**

Add this product to a packer fluid at a point of uniform mixing. Add 300 to 2800 ppm product to a circulating packer fluid to ensure uniform mixing. Seal the treated packer fluid in the wall between the casing and production tube.

#### **INJECTION WASTE FLUIDS**

For the control of contamination and corrosion from bacterial sources, add 200 to 2800 ppm product to the waste fluid prior to or at injection into an approved disposal well.

#### **OIL AND GAS WATER STORAGE AND TRANSMISSION SYSTEMS**

Add 200 to 2800 ppm product to the water storage or transmission system as needed to maintain microbial control.

#### **GAS AND STORAGE WELLS AND SYSTEMS**

Individual injection wells should be treated to produce a concentration of 200 to 2800 ppm product based on the water volume present in the system. Yearly treatments should be applied to maintain effective microbial control. Individual drips should contain 200 to 2800 ppm as needed to maintain microbial control.

#### **HYDROTESTING**

Water used to hydrotest pipelines or vessels should contain 200 to 2800 ppm product.

#### **PIPELINE PIGGING AND SCRAPING OPERATIONS**

Add the appropriate volume of product to achieve a concentration of 200 to 2800 ppm product in the water slug applied immediately following the scraper.

#### **HYDROCARBON, PRODUCTION, STORAGE AND TRANSMISSION SYSTEMS**

Add via direct injection to achieve a concentration of 200 to 2800 ppm product based on the volume of water in the system. For pipeline uses, after application and complete distribution throughout the pipeline, a detectable amount of residual product should be present at the back end of the pipeline system.

#### **WELL SQUEEZE FLUIDS**

For the effective control of aerobic and anaerobic bacteria in squeeze fluids and downhole well bore areas, add this product during pre-mixing of the well squeeze fluid or (in the case of direct mix injection systems) an aqueous solution may be added by direct injection at the well head during the well squeeze procedure.

Frequency and Dose: Use this product for each well squeeze operation to ensure best results. Add 16-215 gallons of this product per 2000 barrels of water (50-700 ppm active ingredient), depending on the quality of the makeup water.

#### **PRODUCED WATER**

To inhibit the growth of slime-forming or corrosion-inducing sulfate-reducing bacteria in formation water produced by wells together with oil or gas, inject this product into the water-containing oil or gas stream at any convenient point. Inject as slug doses, not as a continuous feed.

Frequency and Dose: Depending on severity and rapidity of contamination, slug-dose this product from once a week to once a month at the rate of 30-215 gallons per 2000 barrels of water (98-700 ppm active ingredient).

#### **LIMITED WARRANTY AND DISCLAIMER**

TRIS NITRO 25%  
Master Label  
December 21, 2016

Seller warrants that the product conforms to its chemical description as contained on this label and is reasonably fit for the purposes stated on this label when used in accordance with directions under normal conditions of use. THE WARRANTIES MADE IN THIS PARAGRAPH ARE SELLER'S SOLE WARRANTIES WITH RESPECT TO THE PRODUCT AND ARE MADE EXPRESSLY IN LIEU OF AND EXCLUDE ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE AND ALL OTHER EXPRESS OR IMPLIED REPRESENTATIONS AND WARRANTIES.

NET WT:  
Lot:

Produced For:  
Dow Diamond TM  
**THE DOW CHEMICAL COMPANY**  
**Midland, MI 48674**  
**989-636-4400**

<sup>TM</sup> Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow