

365-76

6/4/2010

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN - 4 2010

Mr. Adrian Kryzman
Director, Product Registration
Troy Corporation
8 Vreeland Road
Florham Park, NJ 07932-0955

Subject: Grotan
EPA Registration Number 365-76
Your Amendment Dated January 18th, 2010
EPA Received Date January 19th, 2010

The amendment referred to above, submitted in connection with under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add the use(s), drilling additives, fuel oils, and fuel systems to the product labeling, is acceptable.

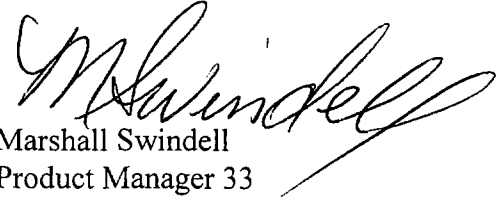
A stamped copy of the labeling is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Submit and/or cite all data required for registration /reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If the above conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

FIRST AID	
IF IN EYES:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
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 SWALLOWED:	Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
NOTE TO PHYSICIAN:	
Probable mucosal damage may contraindicate the use of gastric lavage.	

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

DIRECTIONS FOR USE

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

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

JUN 4 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 365-76

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SOLUBLE EMULSION, SYNTHETIC AND SEMI-SYNTHETIC CUTTING FLUIDS AND COOLANTS

GROTAN should be used at a dilution of 0.15%.

For best results, drain and clean the system before adding fresh cutting fluid. Add 0.15% of GROTAN to the use dilution (1.2 pints per 100 gallons of diluted cutting fluid). 0.15% of GROTAN should be added to the use dilution of the make-up fluid. To inhibit the growth of bacteria and fungi in metalworking, cutting fluids, cooling, and lubricating fluids add GROTAN to the metalworking concentrate that will result in a 0.15% concentration. For example add 3% GROTAN to a metalworking fluid concentrate that will be diluted to 5% in water for use.

For all other uses (Adhesives, drilling additives, joint cements, pigment dispersions, asphalt emulsions and resin emulsions for paint use) use levels from 0.1-0.3% based on the total weight of the formulation. Grotan should be added to the latter phase of the manufacturing process. It should not be exposed to temperatures exceeding 125°F (52 °C) for prolonged periods of time. Further it is not suitable for systems with a pH below 7. Grotan may also be used to control microbial growth at the air-water interface of paint manufacturing raw material storage tanks. A 1.0% aqueous solution of Grotan may be sprayed over the surface. Care should be taken to avoid removal of this interface in paint production. NOTE: May cause discoloration. Color stability in systems should be checked before use.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in original container.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container: Do not reuse or refill this container.

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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6007

Oilfield Systems

For controlling aerobic slime-forming bacteria (*Pseudomonas sp.*) or iron-oxidizing bacteria (*Gallionella sp.*) and anaerobic sulfate-reducing bacteria (*Desulfovibrio desulfuricans*) in oilfield water systems, such as subsurface injection water, add 5-150 ppm Grotan depending on the severity of the contamination. Additions should be made with a metering pump at the free water knockouts before or after the injection pumps and injection well headers.

Continuous-feed method: If this system is noticeably fouled, add 20-150 ppm Grotan (1.7-12.8 gal per 2000 barrels of water) continuously until the desired degree of control is achieved. Subsequently, treat with 5-150 ppm Grotan (0.43-12.8 gal. per 2000 barrels of water) continuously as needed for control.

Intermittent or slug method: If the system is noticeably fouled or to maintain control of the system, add 20-150 ppm Grotan (1.7-12.8 gal. per 2000 barrels of water) intermittently for 2-8 hours per day on from 1-4 days per week, depending on the severity of the contamination.

Preserving Drilling Muds and Workover and Completion Fluids

Determine the volume of Grotan necessary to provide a concentration of 500-1000 ppm by weight of Grotan in the drilling mud system, workover and completion fluid. For example, 21-42 gallons of Grotan per each 1000 barrels of drilling mud provides this concentration. As the system circulates, add Grotan in a thin stream. Add additional Grotan to the system to maintain the proper concentration as the total volume of the system increases.

NOTE: May cause discoloration. Color stability in systems should be checked before use.

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7097

BACTERIAL CONTROL ASSOCIATED WITH FREE AND DISPERSED WATER COMMONLY FOUND IN FUEL SYSTEMS:

Add this product to fuel tanks to control microbial growth in diesel oil, fuel oil, gasoline or kerosene fuel systems. Treatment may be achieved by slug dosing or intermittent metering to provide the proper concentration of this product.

If the volume of water is known, add 0.5-1.5 gallons of this product to each 1,000 gallons of water to achieve concentrations of 500-1000 ppm in the water phase. If the volume of water is unknown add 20 ounces-1 gallon of this product to each 1000 gallons of fuel to achieve concentrations ranging between 150-1000 ppm.

Concentrations of 150-500 ppm of Grotan are appropriate for preventive treatment.

Concentrations of 1000-1500 ppm are appropriate for curative treatment. Since microbes tend to grow within biofilm communities, two or more curative treatments introduced at one-two day intervals may be required to treat heavily contaminated fuel tanks successfully. Since this product is not particularly hydrocarbon soluble there is no adverse effect if some excess accumulates in tank bottoms. It will function as a corrosion inhibitor at higher concentrations.

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