

464-668

01-17-2012

1/5

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

The Dow Chemical Company
1803 Building
Midland, Mi 48674

JAN 17 2012

Attention: Abigail Trueblood
Regulatory Specialist

**Subject: TRIS NITRO Brand of 25% Aqueous Tris (hydroxymethyl)
Nitromethane Industrial Bacteriostat**
EPA Registration No. 464-668
Amendment Dated December 15, 2011

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable

Proposed Amendment:

To clarify and define uses:

- Under the new heading "Use in Oil and Gas Production", add the following subheadings: "Water Floods", "Fracturing Fluids", "Drilling, Completion and Workover Fluids", "Packer Fluids", "Injection Fluids" and "Well Squeeze Fluids"
- Lowering the use rates from 500-1000 ppm active ingredient to 50-700 ppm active ingredient with the exception of the "Produced Water", lowering the use rate to 98-700 ppm active ingredient.

General Comments:

A stamped copy of the "accepted" product labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell".

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

Enclosure

TRIS NITRO 25%
Master Label
December 15.2011

2
5

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%

ACCEPTED
with COMMENTS
EPA Letter Dated:

E.P.A. Registration No. 464-668

JAN 17 2012

E.P.A. Est. XXXX-XX-X

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 464-668

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to by a poison control center or doctor.
IF ON SKIN:	<ul style="list-style-type: none">• 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 :	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance and then give artificial respiration, preferably mouth-to-mouth.• Call a poison control center or doctor for further treatment.
IF IN EYES:	<ul style="list-style-type: none">• Hold eyes open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
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

TRIS NITRO 25%

Master Label

December 15, 2011

notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plan authority. For guidance, contact your State Water Board or Regional Office of the EPA.

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.

ACCEPTED
WITH COMMENTS
EPA Letter Dated:

JAN 17 2012

DIRECTIONS FOR USE

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

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 414-1668

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 gallons 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 quarts of this product (9.5-152 ppm active ingredient) per 1000 gallons of water in the system as needed to maintain control.

TRIS NITRO 25%

Master Label

December 15.2011

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

4
5

USE IN OIL AND GAS PRODUCTION

WATER FLOODS

Add this product to a water flood system at a point of uniform mixing. Add 16-215 gallons of this product per 2000 barrels of water (50-700 ppm active ingredient) to the system weekly, or as needed to maintain control.

FRACTURING FLUIDS

This product reduces bacterial contamination and degradation of fracturing fluids and gels used in oil and gas well stimulations. Add product to the fracturing water storage tanks or directly into the well head injection pipeline as the water is being pumped down-hole.

Dose Range: Add 16-215 gallons of this product per 2000 barrels of water (50- 700 ppm active ingredient) depending on the degree of bacterial fouling in the source water.

DRILLING, COMPLETION, AND WORKOVER FLUIDS

Add this product to a drilling fluid system at a point of uniform mixing such as the circulating mud tank.

Initial treatment: Add 16-215 gallons per 2000 barrels of water (50-700 ppm active ingredient) of this product to a freshly prepared fluid depending on the severity of contamination.

Maintenance dosage: Maintain a concentration of 50-700 ppm active ingredient as needed, depending on the severity of contamination.

PACKER FLUIDS

Add this product to a packer fluid at a point of uniform mixing.

Add 16-215 gallons of this product per 2000 barrels of water (50-700 ppm active ingredient) to a freshly prepared fluid depending on the severity of contamination. Seal the treated packer fluid in the wall between the casing and production tube.

INJECTION FLUIDS

For the control of contamination and corrosion from bacterial sources in fluids/waste fluids that are disposed of through injection into an approved well following approved guidelines, add this product in each volume of fluid prior to injection.

Frequency and Dose: Add 16-215 gallons of this product per 2000 barrels of water (50-700 ppm active ingredient) based on the water percent of the injection fluid.

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.

ACCEPTED

COMMENTS

EPA Letter Dated:

JAN 17 2012

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

46-4-10-8

TRIS NITRO 25%

Master Label

December 15, 2011

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 barrels per 2000 barrels of water (98-700 ppm active ingredient).

NET WT:

Lot:

Produced For

Dow Diamond TM

THE DOW CHEMICAL COMPANY

Midland, Michigan 48674

989-636-4400

TM Trademark of The Dow Chemical Company ("Dow") or an affiliated company of Dow

ACCEPTED
with COMMENTS
EPA Letter Dated:

JAN 17 2012

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 464-668