

George Pazianco  
1338 G Street, S.E.  
Washington, D.C. 20003

MAR 07 1990

Attention: George Pazianco

Product Name: Troyan 174  
Registration Number 5383-11  
Submission Dated 07-19-89  
EPA Received Date 09-26-89

The amendment to revise the certified limits to conform to the new analytical method is acceptable.

The revised Confidential Statement of Formula is acceptable.

Please make the following label revisions:

1. Delete the phrase "For Manufacturing Use Only." This statement may construed to mean your product is used in the manufacturing of pesticides.
2. Include the following product description on the center panel of your label. "For use as a preservative in various commodity products."
3. Revise the second sentence of your use directions to read:  
"This product is to be used only in the manufacture of the specific products as outlined in the technical bulletin. Refer to the technical bulletin for specific use directions."
4. Refer to EPA Notice 83-3 for the appropriate Storage and Disposal Instructions. These instructions should be the same as in the last accepted label, November 1, 1987.

CONCURRENCES

| SYMBOL  |  |  |  |  |  |  |  |  |
|---------|--|--|--|--|--|--|--|--|
| SURNAME |  |  |  |  |  |  |  |  |
| DATE    |  |  |  |  |  |  |  |  |

5. In the ingredient statement, the words "Active Ingredients and Inert Ingredients should be the same type size and be aligned to the same margin.

6. Revise your Environmental Hazards statement to read as follows:

#### Environmental Hazards

This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### Technical Bulletin

1. Throughout your bulletin, change the word "systems" to "products."
2. Delete the phrase "and any other systems where water in a primary component." You must specify the exact product you have in mind. Any additional product types you wish to add must be requested by an amendment.
3. Include a statement such as "See container label for complete precautionary statements and Storage and Disposal instructions."

Submit five (5) copies of corrected draft labels and technical bulletins.

If you have any questions concerning this letter, please contact Karen M. Leavy at (703)-557-3966.

Sincerely Yours,

John H. Lee  
Product Manager (31)

CONCURRENTIAL PROGRAM BRANCH  
Registration Division (705-C)

SYMBOL

SURNAME

DATE

**PRECAUTIONARY  
STATEMENTS**

**HAZARDS TO HUMANS  
(AND DOMESTIC ANIMALS)**

**DANGER**

**DANGER:** Corrosive. Causes eye damage and skin burns. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed or absorbed through skin. May cause allergic skin reaction. Harmful if swallowed. Do not breathe vapors or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**STATEMENT OF PRACTICAL  
TREATMENT**

**If In Eyes:** Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention.

**If on Skin:** Wash with plenty of soap and water. Get medical attention.

**If Swallowed:** Drink promptly a large quantity of egg whites or gelatin solution, or, if these are not available, large quantities of water. Never give anything by mouth to an unconscious person. Avoid alcohol. Get medical attention.

**If Inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

**Note To Physician:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not apply directly to water or wetlands. Do not contaminate water when disposing of equipment washwater.

**TROYSAN®**

**174**

E.P.A. REG. NO. 5383-11

E.P.A. ESTAB. NO. 5383-N.J.-1

**ACTIVE INGREDIENT:**

|                                           |              |
|-------------------------------------------|--------------|
| 2 - [(Hydroxymethyl) amino] ethanol ..... | 97.0         |
| Inert Ingredients .....                   | 3.0          |
| <b>TOTAL</b>                              | <b>100.0</b> |

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

**BEST AVAILABLE COPY**

**FOR MANUFACTURING USE ONLY**

**Manufactured by:**

**TROY CHEMICAL CORPORATION  
NEWARK, NEW JERSEY 07105**

TROYSAN® 174 is a non-metallic, organic biocide designed for use in systems which are subject to bacterial deterioration. Examples of such systems are: latex paints, resin emulsions, adhesives, pigment dispersions, joint cements, cutting oils, drilling additives and any other system where water is a primary component. It is supplied as a clear amber water-soluble liquid. TROYSAN® 174 is a broad spectrum biocide. The following list is a sampling of the types of organisms against which 174 has demonstrated efficacy:

| ORGANISMS                                | MIC(ppm) |
|------------------------------------------|----------|
| <i>Pseudomonas aeruginosa</i> .....      | 150-250  |
| <i>Pseudomonas fluorescens</i> .....     | 300-500  |
| <i>Enterobacter aerogenes</i> .....      | 150-250  |
| <i>Escherichia coli</i> .....            | 250-500  |
| <i>Bacillus subtilis</i> .....           | 150-250  |
| <i>Staphylococcus aureus</i> .....       | 150-250  |
| <i>Desulfovibrio desulfuricans</i> ..... | 10-30    |
| <i>Proteus vulgaris</i> .....            | 150-250  |
| <i>Serratia marcescens</i> .....         | 150-250  |
| <i>Aureobasidium pullulans</i> .....     | 800-1000 |
| <i>Aspergillus niger</i> .....           | 250-500  |
| <i>Penicillium sp</i> .....              | 250-500  |

## USE

TROYSAN® 174 is used in all systems where water is a primary component. Normal use levels range from

..... TROYSAN® 174 should be used in the latter phase of the manufacturing process. It should not be exposed to temperatures exceeding 125°F for prolonged periods of time. Further, TROYSAN® 174 is not suitable for use in systems with a pH below 3.

## ADVANTAGES

- lowest cost biocide
- broad spectrum biocide
- ease of incorporation
- excellent freeze-thaw stability as well as a low freezing point
- over 10 years of successful field performance
- long lasting efficacy

## PACKAGING

TROYSAN® 174 is supplied in:

|                       |                |
|-----------------------|----------------|
| 55 gallon drums ..... | (500 lbs. net) |
| 15 gallon drums ..... | (125 lbs. net) |
| 5 gallon pails .....  | ( 45 lbs. net) |

## HANDLING AND STORAGE

Avoid storage at temperatures exceeding 120°F for extended periods of time. When handling, avoid contact with abraded skin or eyes. If accidental contact occurs, flush affected area with large volumes of water for at least 15 minutes and seek medical attention. Harmful if ingested. Use in well ventilated area and follow accepted housekeeping practices.

## TYPICAL PROPERTIES

Active Ingredient:

2[(Hydroxymethyl) amino] ethanol: ..... 97.0%

Physical Form: ..... Clear amber liquid

Specific Gravity: ..... 1.14-1.16

Lbs/Gal.: ..... 9.5-9.6

pH: ..... 11-11.7

Viscosity (Gardner): ..... L Max.

Color (Gardner): ..... 7 Max.

Solubility: ..... Completely soluble in water

**NOTE:** The above typical properties are not to be considered as purchase specifications.