

JUL 07 2004

Troy Corporation
8 Vreeland Road
P.O. Box 955
Florham Park, N. J. 07932-0955

Attention: Carrie M. Buck
Product Registration Coordinator

Subject: Troysan 192II
EPA Registration No. 5383-82
Your Notification Dated June 4, 2004

This will acknowledge receipt of your notification for the following additional brand names, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

Additional Brand Names

- "Mergal 192-II"
- "Mergal 192"

The notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

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

Sincerely



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

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							



TROY CORPORATION

June 18, 2004

Mr. Marshall Swindell
Product Manager Team 33
Regulatory Management Branch I
Antimicrobials Division (7501C)
United States Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
1200 Pennsylvania Ave., NW
Washington, DC 20460

**RE: Troy Chemical Corporation
Troysan 192-II (EPA Reg. No. 5383-82)
Notification of Alternate Brand Name per PR Notice 98-10**

Dear Mr. Swindell:

Troy Corporation hereby submits an application for Pesticide Notification to propose an alternate brand name for Troysan 192-II (EPA Reg. No. 5383-82) in accordance with PR Notice 98-10. The alternate brand name for Troysan 192-II is as follows:

"Mergal 192"


To support this Notification of Alternate Brand Name for Mergal 192, I am submitting an Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10. Also enclosed is a copy of the label with the changes clearly marked.

If you should have any questions or require additional information, please feel free to contact me directly at (973) 443-4200 Ext. 2206, or by email at buckc@troycorp.com.

Sincerely,

A handwritten signature in black ink that reads "Carrie M. Buck".

Carrie M. Buck
Product Registration Coordinator

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
---	---	-----------------------

Application for Pesticide - Section I

1. Company/Product Number 5383-82	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Troysan@192-11	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Troy Chemical Corporation 8 Vreeland Road Florham Park, NJ 07932 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Alternate Brand Name "Mergal 192"

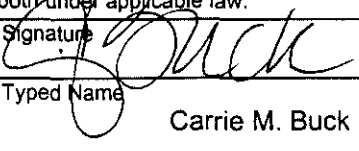
Notification of Alternate Brand Name per PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under § 12 and § 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
*Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon to bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Carrie M. Buck	Title Product Registration Coordinator	Telephone No. (include Area Code) (973) 443-4200 Ext. 2206
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <div style="border: 1px solid black; padding: 5px; text-align: center;"> (Stamped) </div>
2. Signature 	3. Title Product Registration Coordinator	
4. Typed Name Carrie M. Buck	5. Date June 18, 2004	

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

Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin, or on clothing. Harmful if swallowed, inhaled or absorbed through skin. Wear goggles, or face shield, and rubber gloves when handling. Avoid breathing vapor or spray mist. Avoid contamination of food. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not use this product in a way that will contact other workers or other persons.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Goggles or face shield
- Long sleeve shirt and long pants
- Socks and shoes
- Rubber gloves

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment. If no such instructions for washables, use detergent and hot water. Keep and wash personal protective equipment separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

FIRST AID

IF IN EYES:	<ul style="list-style-type: none"> • 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:	<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 SWALLOWED:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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. Measures against circulatory shock, respiratory depression, and convulsion may be needed.	

MERGAL® 192

IN-CAN PRESERVATIVE AGAINST BACTERIA IN LATEX PAINTS, INKS, ADHESIVES, RESIN EMULSIONS, OILFIELD WATER SYSTEMS, METAL WORKING FLUIDS, DRILLING MUDS AND COMPLETION FLUIDS

EPA Reg. No. 5383-82

EPA Est. No. 5383-NJ-1

ACTIVE INGREDIENT:

4,4 Dimethyloxazolidine 73.7%

INERT INGREDIENTS 26.3%

TOTAL..... 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

SOLD FOR INDUSTRIAL USE ONLY

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

IN CASE OF EMERGENCY CALL 1-800-CHEMTREC

TROY CHEMICAL CORPORATION

ONE AVENUE L

NEWARK, N.J. 07105

Net Weight: _____

®MERGAL AND POLYPHASE ARE REGISTERED TRADEMARKS

ENVIRONME

This pesticide is toxic to fish and wildlife. Do not dispose of equipment washwaters. Do not dump in streams, ponds, estuaries, oceans, or other water bodies. National Pollutant Discharge Elimination System (NPDES) has been notified in writing prior to discharge. Do not discharge to sewer systems without previously notifying the appropriate guidance contact your State water board or regional office.

DIRECTIO

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

APPL

Mergal®192 is sold for industrial use only. See label for field evaluations and are typical for the use of this product as percentage weight/weight in the final use product. **Paints, Inks, and Emulsions** Mergal®192 is used in systems such as latex paints, inks and resin emulsions. The actual formulation weight. The suggested use rate for emulsions is approximately 0.2 lb. per 100 lbs. of actual formulation weight. The suggested use rate for contact add 0.1-0.5 lb. per 100 lbs. total formulation. For subsurface injection water, add 5-150 ppm. For noticeably fouled, add 20-150 ppm (1.7-12.8 g/l) to the desired degree of control is achieved. Subsequent cleaning (2000 barrels of water) continuously as needed. If the system is noticeably fouled, or to maintain the system per 2000 barrels of water) intermittently for 2-4 weeks. 2000 ppm is sufficient to control gross microbial growth of fluid. Maintenance dosage add 250-500 ppm to the system. The addition of 8 ounces (1 cup) to each barrel of concentration. In concentrates Mergal®192 concentrate pH is maintained above 6. However, long term use depends on his specific formulations to ensure that the system is compatible with Mergal®192 stability. The suggested factor to be used when the concentrate is diluted. The concentration of 1000-2000 ppm in the diluted solution. **and Completion Fluids** determine the volume of fluid. The concentration of 500-1000 ppm by weight of fluid. As the system circulates, add additional Mergal®192 to the system to maintain the system increases.

PHYSICAL AND C

Combustible. Do not use, spill or store near heat or open flame. Alkaline.

STORAGE A

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Do not store at freezing temperatures. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely toxic. Do not mix pesticides, spray mixture, or rinsate is a violation of Federal Law. by use according to label instructions, contact your local hazardous waste representative at the nearest authorized facility. **CONTAINER DISPOSAL:** Triple rinse (or equivalent) and puncture and dispose of in a sanitary landfill, or by other means, by burning. If burned, stay out of smoke.

33



5/1

TROY CORPORATION

June 4, 2004

Mr. Marshall Swindell
Product Manager Team 33
Regulatory Management Branch I
Antimicrobials Division (7501C)
United States Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
1200 Pennsylvania Ave., NW
Washington, DC 20460

**RE: Troy Chemical Corporation
 Troysan 192-II (EPA Reg. No. 5383-82)
 Notification of Alternate Brand Name per PR Notice 98-10**

Dear Mr. Swindell:

Troy Corporation hereby submits an application for Pesticide Notification to propose an alternate brand name for Troysan 192-II (EPA Reg. No. 5383-82) in accordance with PR Notice 98-10. The alternate brand name for Troysan 192-II is as follows:

“Mergal 192-II”

To support this Notification of Alternate Brand Name for Mergal 192-II, I am submitting an Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10. Also enclosed is a copy of the label with the changes clearly marked.

If you should have any questions or require additional information, please feel free to contact me directly at (973) 443-4200 Ext. 2206, or by email at buckc@troycorp.com.

Sincerely,

Carrie M. Buck
Product Registration Coordinator

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
--	---	-----------------------

Application for Pesticide - Section I

1. Company/Product Number 5383-82	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Troysan@192-II	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Troy Chemical Corporation 8 Vreeland Road Florham Park, NJ 07932 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below
--	---

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Alternate Brand Name "Mergal 192-II"

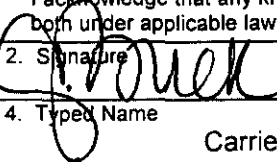
Notification of Alternate Brand Name per PR Notice 98-10

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. § 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under § 12 and § 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container <p style="text-align: center;">1 gallon to bulk</p>	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product			
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name <p style="text-align: center;">Carrie M. Buck</p>	Title <p style="text-align: center;">Product Registration Coordinator</p>	Telephone No. (Include Area Code) <p style="text-align: center;">(973) 443-4200 Ext. 2206</p>
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received <p style="text-align: center;">(Stamped)</p>
2. Signature 	3. Title <p style="text-align: center;">Product Registration Coordinator</p>	
4. Typed Name <p style="text-align: center;">Carrie M. Buck</p>	5. Date <p style="text-align: center;">June 4, 2004</p>	

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

Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin, or on clothing. Harmful if swallowed, inhaled or absorbed through skin. Wear goggles, or face shield, and rubber gloves when handling. Avoid breathing vapor or spray mist. Avoid contamination of food. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not use this product in a way that will contact other workers or other persons.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Goggles or face shield
- Long sleeve shirt and long pants
- Socks and shoes
- Rubber gloves

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment. If no such instructions for washables, use detergent and hot water. Keep and wash personal protective equipment separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly.

FIRST AID

IF IN EYES:	<ul style="list-style-type: none"> • 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:	<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 SWALLOWED:	<ul style="list-style-type: none"> • 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:	<ul style="list-style-type: none"> • 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. Measurements against circulatory shock, respiratory depression, and convulsion may be needed.

MERGAL®192-II

IN-CAN PRESERVATIVE AGAINST BACTERIA IN LATEX PAINTS, INKS, ADHESIVES, RESIN EMULSIONS, OILFIELD WATER SYSTEMS, METAL WORKING FLUIDS, DRILLING MUDS AND COMPLETION FLUIDS

EPA Reg. No. 5383-82

EPA Est. No. 5383-NJ-1

ACTIVE INGREDIENT:

4,4 Dimethylloxazolidine 73.7%

INERT INGREDIENTS. 26.3%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

SOLD FOR INDUSTRIAL USE ONLY
SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

IN CASE OF EMERGENCY CALL 1-800-CHEMTREC

TROY CHEMICAL CORPORATION
ONE AVENUE L
NEWARK, N.J. 07105

Net Weight: _____

®MERGAL AND POLYPHASE REGISTERED TRADEMARKS

ENVIRONMENT

This pesticide is toxic to fish and wildlife. Do not dispose of equipment washwaters. Do not discharge into streams, ponds, estuaries, oceans, or other water bodies. National Pollutant Discharge Elimination System (NPDES) has been notified in writing prior to discharge. For information on sewer systems without previously notifying your local authority, contact your State water board or regional office.

DIRECTIONS

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

APPLICATION

Mergal®192-II is sold for industrial use only. Laboratory and field evaluations and are typical of other products in this class. Percentages reported are as percentage weight/weight in the formulation. **Paints, Inks, and Emulsions Mergal®192-II** is used in systems such as latex paints, inks and resin emulsions. The suggested use is 0.1-2.0 lb. per 100 lb. of the formulation. The suggested use for emulsions is approximately 0.2 lb. per 100 lbs. of actual formulation weight. The suggested use for **contact** is 0.1-0.5 lb. per 100 lbs. total formulation weight. For subsurface injection water, add 5-150 ppm. For noticeably fouled, add 20-150 ppm (1.7-12.8 g per 100 lbs. of water) continuously as needed. For desired degree of control is achieved. Subsequent to 2000 barrels of water) continuously as needed. For the system is noticeably fouled, or to maintain a concentration of 2000 ppm (intermittently for 2-4 weeks on the severity of contamination. **Metalworking Fluids** 2000 ppm is sufficient to control gross microbiological growth of fluid. Maintenance dosage add 250-500 ppm. The addition of 8 ounces (1 cup) to each 2000 ppm concentration. In concentrates Mergal®192-II the pH is maintained above 6. However, long term use of this product may require the use of ingredients incompatible with Mergal®192-II. The use of this product depends on dilution factor to be used when the bacteriostatic activity a concentration of 1000-2000 ppm is necessary to provide a concentration of 500-1000 ppm in a thin stream. Add additional Mergal®192-II as the total volume of the system increases.

PHYSICAL AND CHEMICAL

Combustible. Do not use, spill or store near heat or open flame. Alkaline.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Do not store at freezing temperatures. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely toxic. Do not discharge into streams, rivers, ponds, or other water bodies. For disposal by use according to label instructions, contact your local hazardous waste representative at the nearest authority. **CONTAINER DISPOSAL:** Triple rinse (or equivalent) and dispose of in a sanitary landfill, or by other means as directed by local authorities, by burning. If burned, stay out of smoke.