

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 9, 2019

Maureen Miksztal Senior Regulatory Manager Troy Chemical Corporation c/o Troy Corporation 8 Vreeland Road Florham Park, NJ 07932

Subject: Label Amendment – Adding Oil Field Uses

Product Name: Troysan 192II EPA Registration Number: 5383-82 Application Date: 08/14/2019 Decision Number: 556130

Dear Ms. Miksztal:

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

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with FIFRA section 6. If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at Heffernan.Aline@epa.gov.

Sincerely,

Kathryn Montague, Acting Product Manager 33

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Regulatory Management Branch 1 Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure: Stamped label

TROYSAN ® 19211

In-Can Preservative against Bacteria in Adhesives, Drilling Muds, Workover and Completion Fluids, Fracturing Fluids*, Inks, Latex Paints, Metal Working Fluids, Mineral Slurries, Oil and Gas Production* and Oilfield Water Systems, Resin Emulsions, Home Care Cleaning Products: Floor Cleaners, Laundry Additives, Liquid Laundry Detergents, Fabric Softeners, Stain Removers, Polishes, Surface Cleaners and Waxes. For Use in Metal Working Fluids in Closed or Semi-Enclosed Machines the Described Directions for Use. as in

ACTIVE INGREDIENT: % Weight

4,4-Dimethyloxazolidine73.7% INERT INGREDIENTS......26.3% TOTAL100.0%

EPA Reg. No. 5383-82 **EPA Establishment Number** 5383-NJ-001 ACCEPTED

12/09/2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 5383-82

KEEP OUT OF REACH OF CHILDREN

DANGER

FOR INDUSTRIAL USE

See Side Panel for Additional Precautionary Statements

IN CASE OF EMERGENCY: CALL CHEMTREC 1-800-424-9300

Net Weight:

[Manufactured for: / Manufactured by: Produced for: / Sold by:]

Troy Chemical Corporation

One Avenue L, Newark, N.J. 07105

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. For closed loading systems that are engineered to eliminate contact with aerosols and vapors, workers must have access to a respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH prefix TC-14G), or a NIOSH approved respirator with an organic vapor mist (OV) cartridge or canister with any R, P, or HE prefilter. For open pour systems workers must wear the type of respirator specified above. Avoid contamination of food. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. 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 PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY:

- 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 personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly.

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 the first 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:	 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 do so by a poison control center or doctor. 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 following ingestion. Measures against circulatory shock, respiratory depression and convulsion may be needed.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. 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.

PHYSICAL AND CHEMICAL HAZARDS

Combustible. Do not use, spill or store near heat or open flame. Troysan 192II is strongly alkaline.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store at freezing temperatures for prolonged periods of time.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Open dumping is prohibited. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Improper disposal of excess pesticides, spray mixture, or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State pesticide or environmental control agency or the hazardous waste representative at the nearest EPA regional office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ½ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available, 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.

MASTER LABEL - Sub-label A:

In-Can Preservative against Bacteria in Adhesives, Drilling Muds and Completion Fluids, Inks, Latex Paints, Metal Working Fluids, Oilfield Water Systems, Resin Emulsions. For Use in Metal Working Fluids in Closed or Semi-Enclosed Machines as Described in the Directions for Use.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For use in formulating metalworking fluid concentrates that will be used in closed or semi-enclosed machines. Semi-enclosed machines are machines that provide effective mist containment.

APPLICATION

Troysan®192II is sold for industrial use. Use rates are based on laboratory and field evaluations and are typical for the use areas indicated. Use rates are reported as percentage weight/weight in the final use product.

Troysan®192II is prohibited for use on items which come into contact with food, feed or drinking water.

Paints, Inks and Resin Emulsions: Troysan®192II is effective as a preservative in water-containing coating systems: latex paints, inks and resin emulsions. The use rate for preservation of inks and latex paint is 0.1-0.2 lb. per 100 lb. of the formulation. The use rate for preservation of resin emulsions is 0.2 lb. per 100 lbs. of the formulation.

Adhesives (non-food contact): the use rate is 0.1-0.5 lb. per 100 lbs. total formulating weight.

Oilfield Water Systems (subsurface injection water): the use rate is 5-150 ppm. For continuous feed method if the system is noticeably fouled, add 20-150 ppm (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 (0.43-12.8 gal. per 2000 barrels of water) continuously as needed to maintain control. Intermittent or slug method if the system is noticeably fouled, or to maintain control of the system, add 20-150 pm (0.7-12.8 gal. per 2000 barrels of water) intermittently for 2-8 hours per day for 1-4 days per week depending on the severity of contamination.

Drilling Muds and Workover and Completion Fluids: determine the volume of Troysan®192II necessary to provide a concentration of 500- 1000 ppm by weight of Troysan®192II in the system. As the system circulates, add the Troysan®192II in a thin stream. Add additional Troysan®192II to the system to maintain the proper concentration as the total volume of the system increases.

Metalworking Fluids: in diluted fluids a concentration of 1000-2000 ppm is sufficient to control gross microbial growth. To inhibit the growth of bacteria in metalworking, cutting fluids, cooling and lubricating fluids add Troysan 192 II to the metalworking concentrate that will result in a 1000 – 2000 ppm concentration when the fluid is diluted in use. For example, add 2 – 4% Troysan 192 II to a metalworking fluid concentrate that will be diluted to 5% in water for use. Maintenance dosage: add 250-500 ppm weekly as required to maintain control of the system. The addition of 8 ounces (1 cup) to each 100 gallons of fluid will provide a 500 ppm concentration. Troysan®192II will be stable in concentrates as long as the pH is maintained above 6, however, it is recommended that long term studies be carried out by the manufacturer on his specific formulations to ensure that the concentrate does not contain ingredients incompatible with Troysan®192II stability.

Mineral Slurries:

For control of bacterial contamination in mineral slurries: add 0.04 to 0.21 lb per 100 lb slurry (400 – 2100 ppm) of Troysan®192II.

MASTER LABEL - Sub-label B:

In-Can Preservative against Bacteria in Home Care Cleaning Products: Floor Cleaners, Laundry Additives, Liquid Laundry Detergents, Fabric Softeners, Stain Removers, Polishes, Surface Cleaners and Waxes.

DIRECTIONS FOR USE

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

APPLICATION

Troysan®192II is for industrial use. Use rates are based on laboratory and field evaluations and are typical for the use areas indicated. Use rates are reported as percentage weight/weight in the final use product.

Troysan®192II is prohibited for use on items which come into contact with food, feed or drinking water.

Home Cleaning Products, Laundry Additives, Detergents and Stain Removers: Troysan®192II is effective as a preservative in water-containing cleaning products and laundry additives at a concentration of 0.1-0.5 lb. per 100 lbs. of actual formulation weight.

Preservatives for Concentrates: For use in concentrates where effective preservation is needed after dilution, add Troysan®192II to the product formulation at a rate such that the diluted end-use product will contain 0.1% to 0.5% Troysan®192II.

MASTER LABEL - Sub-label C:

In-Can Preservative against Bacteria in Drilling Muds, Workover and Completion Fluids, Fracturing Fluids*, Oil and Gas Production* and Oilfield Water Systems

DIRECTIONS FOR USE

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

APPLICATION

Troysan®192II is sold for industrial use. Use rates are based on laboratory and field evaluations and are typical for the use areas indicated. Use rates are reported as percentage weight/weight in the final use product.

Troysan®192II is prohibited for use on items which come into contact with food, feed or drinking water.

OIL AND GAS PRODUCTION*

At a point of uniform mixing, apply Troysan®192II 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 concentrations listed provide control of microorganisms at differing levels of contamination.

FRACTURING FLUIDS*

Add 50 to 1,000 ppm product at any point in the production or application of the fracturing fluid to reduce bacterial contamination and fracturing fluid degradation.

Drilling Muds and Workover and Completion Fluids: determine the volume of Troysan®192II necessary to provide a concentration of 500 - 1,000 ppm by weight of Troysan®192II in the system. As the system circulates, add the Troysan®192II in a thin stream. Add additional Troysan®192II to the system to maintain the proper concentration as the total volume of the system increases.

Oilfield Water Systems (subsurface injection water): the use rate is 5-150 ppm. For continuous feed method if the system is noticeably fouled, add 20-150 ppm (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 (0.43-12.8 gal. per 2000 barrels of water) continuously as needed to maintain control. Intermittent or slug method if the system is noticeably fouled, or to maintain control of the system, add 20-150 pm (0.7-12.8 gal. per 2000 barrels of water) intermittently for 2-8 hours per day for 1-4 days per week depending on the severity of contamination.

INJECTION WASTE FLUIDS*

Add 50 to 1,000 ppm product to the waste fluid prior to or at injection into an approved disposal well.

WATER FLOODS AND ENHANCED OIL RECOVERY FLUIDS*

Intermittent or continuous dosing can be applied to the fluid to achieve a concentration of 50 to 1,000 ppm product for effective microbial control.

OIL AND GAS WATER STORAGE AND TRANSMISSION SYSTEMS*

Add 50 to 1,000 ppm product to the water storage or transmission system as needed to maintain microbial control.

PACKER FLUIDS*

Add 50 to 1,000 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.

GAS STORAGE WELLS AND SYSTEMS*

Individual injection wells should be treated to produce a concentration of 50 to 1,000 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 50 to 1,000 ppm as needed to maintain microbial control.

HYDROTESTING*

Water used to hydrotest pipelines or vessels should contain 50 to 1,000 ppm product.

HYDROCARBON PRODUCTION, STORAGE AND TRANSMISSION SYSTEMS*

Add via direct injection to achieve a concentration of 50 to 1,000 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.

*Not registered for use in the State of California.

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