



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 11, 2019

Patti Golick
Regulatory Specialist
Troy Chemical Corporation c/o
Troy Corporation
8 Vreeland Road
Florham Park, N.J. 07932

Subject: Notification per PRN 98-10 – Correct error for nomenclature of Active Ingredient
Product Name: MERGAL BIT20
EPA Registration Number: 5383-121
Application Date: 09/26/2018
Decision Number: 545938

Dear Ms. Golick:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact Jake Farley at (703) 347-0123 or via email at Farley.Jake@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Zeno Bain".

Zeno Bain, Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

NOTIFICATION

5383-121

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

03/11/2019

MERGAL ® BIT20

For Industrial Use Only As A Microbiostat Preservative Intended To Protect Adhesives, Building And Construction Compositions, Emulsion Paint And Coatings, Inks, Lattices, Leather Processing Solutions, Metalworking Fluids, Mineral Slurries And Dispersions, Oil Recovery Systems, Paper Coatings, Pesticide Formulations, Polymer Emulsions, Textile Spin-Finish And Coatings, Car Care Products Including Car Washes, Car Waxes And Silicone Emulsions, Home Care Cleaning Products Including Floor Cleaners, Floor Waxes, Floor Polishes And Surface Cleaners, Laundry Additives Including Liquid Laundry Detergents, Fabric Softeners And Stain Removers.

ACTIVE INGREDIENT: % Weight

~~1,2-Benzisothiazolin-3(2H)-One~~ **1,2-Benzisothiazol-3(2H)-One**

.....19.18%

INERT INGREDIENTS..... 80.82%

TOTAL..... 100.00%

EPA Reg. No.

5383-121

EPA Establishment Number

5383-NJ-001

KEEP OUT OF REACH OF CHILDREN

DANGER

FOR INDUSTRIAL USE ONLY

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

Net Weight:

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

Troy Chemical Corporation

One Avenue L, Newark, N.J. 07105

TROYGUARD® and MERGAL® are registered trademarks

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes irreversible eye damage. Do not get in eyes, on skin or on clothing. Harmful if swallowed, inhaled, or, absorbed through skin. Avoid breathing vapor or spray mist. Wear protective eyewear (goggles or face shield) long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves (such as Barrier laminate, Butyl, Nitrile, or Neoprene Rubber, Polyvinyl Chloride).

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should:

- Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing

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 the first 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 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.
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 do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Emergency Phone Number: 800-424-9300

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 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 EPA.

PHYSICAL OR CHEMICAL HAZARDS

This product is incompatible with other chemicals (oxidizing agents)

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Protect from frost. If frozen, allow to thaw and stir well before use.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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 HANDLING: Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ 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:

For Industrial Use Only As A Microbiostat Preservative Intended To Protect Adhesives, Building And Construction Compositions, Emulsion Paint And Coatings, Inks, Lattices, Leather Processing Solutions, Metalworking Fluids, Mineral Slurries And Dispersions, Oil Recovery Systems, Paper Coatings, Pesticide Formulations, Polymer Emulsions, Textile Spin-Finish And Coatings.

DIRECTIONS FOR USE

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

GENERAL INFORMATION

APPLICATION RATE: Mergal®BIT20 is an effective preservative for most aqueous applications. Mergal®BIT20 is used in aqueous or water-containing products and systems to control growth of bacteria and fungi. Use rates are in percentage by weight and refer to the product Mergal®BIT20. In order to determine the most cost effective use level for Mergal®BIT20 in a given use, field trials are suggested.

GENERAL RECOMMENDATIONS: For protection against bacterial attack, a concentration within the range of 0.02 – 0.35% of this product is almost invariably sufficient. The control of mold growth, particularly on paste products of high solids content, may occasionally demand dosages above 0.25%. In dilute fluid systems, spoilage is usually controlled with dosages not greater than 0.09%.

The use rate is 0.05 – 0.35% wt/wt in the following products: Adhesives, Building and Construction Compositions, Emulsion Paint and Coatings, Inks, Lattices, Leather Processing Solutions, Metalworking Fluids, Mineral Slurries and Dispersions, Paper Coatings, Pesticide Formulations, Polymer Emulsions, Textile Spin-Finish and Coatings.

Mergal®BIT20 is approved for adhesives used in food packaging and food contact paper and paperboard coatings. Use of Mergal®BIT20 must not exceed 0.21 mg/in² (0.0326 mg/cm²) of finished paper and paperboard intended for contact with dry foods and 0.11 mg/in² (0.0168 mg/cm²) of finished paper and paperboard intended for contact with aqueous and fatty foods.

Oil Recovery Systems: Drilling fluids, packer fluids, completion fluids: Polysaccharide fluid loss control agents and thickeners such as starch, guar, and xanthan gum at a use rate of 0.05 – 0.15% on fluid weight or 1.5 – 4.5% on the dry polysaccharide weight. Subsurface injection waters such as polymer and micellar/polymer waterfloods: Thickeners such as polysaccharides and xanthan gum at a use rate of 0.05 – 0.15% on the solution weight. .

SUPPLEMENTAL DOSING:

Depending on the nature/severity of the contamination, if analysis indicates a loss of active ingredient(s) and further microbial control is necessary, product may be dosed with additional [*Insert Product Name*] microbiocide at a level to ensure that the final use-dilution product will not exceed the maximum concentration indicated (*max dosage level ppm Insert Product Name*).

MASTER LABEL - Sub-label B:

For Industrial Use Only As A Microbiostat Preservative Intended To Protect Car Care Products Including Car Washes, Car Waxes And Silicone Emulsions, Home Care Cleaning Products Including Floor Cleaners, Floor Waxes, Floor Polishes And Surface Cleaners, Laundry Additives Including Liquid Laundry Detergents, Fabric Softeners And Stain Removers.

DIRECTIONS FOR USE

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

GENERAL INFORMATION

APPLICATION RATE: Mergal®BIT20 is an effective preservative for most aqueous applications. Mergal®BIT20 is used in aqueous or water-containing products and systems to control growth of bacteria and fungi. Use rates are in percentage by weight and refer to the product Mergal®BIT20. In order to determine the most cost effective use level for Mergal®BIT20 in a given use, field trials are suggested.

The use rate is 0.05 – 0.3% wt/wt in the following products: Car Washes, Car Waxes And Silicone Emulsions, Home Care Cleaning Products Including Floor Cleaners, Floor Waxes, Floor Polishes And Surface Cleaners, Laundry Additives Including Liquid Laundry Detergents, Fabric Softeners And Stain Removers.

Preservatives for Concentrates: For use in concentrates where effective preservation is needed after dilution, add Mergal®BIT20 to the product formulation at a rate such that the diluted end-use product will contain 0.05 – 0.3% Mergal®BIT20.

MASTER LABEL - Sub-label C:¹

For Industrial Use Only As A Microbiostat Preservative Intended To Protect Adhesives, Building And Construction Compositions, Emulsion Paint And Coatings, Inks, Lattices, Pesticide Formulations, Polymer Emulsions, Car Care Cleaning Products including Car Washes, Car Waxes, and Silicon Emulsions, Home Care Cleaning Products including Floor Cleaners, Floor Waxes, Floor Polishes, and Surface Cleaners, Laundry Additives including Liquid Laundry Detergents, Fabric Softeners and Stain Removers.

DIRECTIONS FOR USE

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

GENERAL INFORMATION

APPLICATION RATE: Mergal®BIT20 is an effective preservative for most aqueous applications. Mergal®BIT20 is used in aqueous or water-containing products and systems to control growth of bacteria and fungi. Use rates are in percentage by weight and refer to the product Mergal®BIT20. In order to determine the most cost effective use level for Mergal®BIT20 in a given use, field trials are suggested.

The use rate is 0.05-0.35% wt/wt of Mergal®BIT20 in the following products: Adhesives, Building and Construction Compositions, Emulsion Paint and Coatings, Inks, Lattices, Pesticide Formulations, Polymer Emulsions

The use rate is 0.05-0.3% wt/wt in the following products: Car Washes, Car Waxes and Silicone Emulsions, Home Care Cleaning Products Including Floor Cleaners, Floor Waxes, Floor Polishes and Surface Cleaners, Laundry Additives Including Liquid Laundry Detergents, Fabric Softeners and Stain Removers.

Preservatives for Concentrates: For use in concentrates where effective preservation is needed after dilution, add Mergal®BIT20 to the product formulation at a rate such that the diluted end-use product will contain 0.05 – 0.3% Mergal®BIT20.

SUPPLEMENTAL DOSING:

Depending on the nature/severity of the contamination, if analysis indicates a loss of active ingredient(s) and further microbial control is necessary, product may be dosed with additional [*Insert Product Name*] microbiocide at a level to ensure that the final use-dilution product will not exceed the maximum concentration indicated (*max dosage level ppm Insert Product Name*).

EPA MASTER LABEL 09262018

^{1 1} For subregistrants – Combines both H I&I and most industrial uses