

6836-322

08-15-2011

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

AUG 15 2011

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Ms. Joanna Holcombe  
Lonza Inc  
90 Boroline Road  
Allendale, NJ 07401

Subject: Dantogard 2000 Preservative  
EPA Registration No.: 6836-322  
Amendment Date: September 15, 2010  
EPA Receipt Date: September 16, 2010

Dear Ms. Holcombe,

The following amendment submitted in connection with registration under FIFRA section 3(c)(7)(A) is acceptable with conditions.

**Proposed Amendment**

- Oil field and petrochemical operations

**Conditions**

Revise the label as follows:

1.) According to the March 26, 1999 acute toxicology evaluation, this product is category III for primary eye irritation and category IV for inhalation. Therefore, the "Precautionary Statements" on page 2 must be revised to read:

**CAUTION.** *Causes moderate eye irritation.* Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin, or clothing. *Wear safety goggles or faceshield and chemical resistant gloves.* Wash thoroughly with soap and water after handling *and before eating, drinking, chewing gum, or using tobacco.*

2.) Rearrange the "First Aid" statements on page 2 by placing the "If Swallowed" statements before the "If Inhaled" statements.

3.) Delete the "Note to Physician" on page 2 since the product's acute toxicity classification does not trigger this language.

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

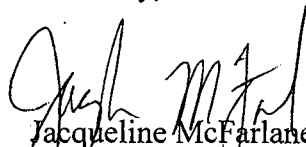
- 4.) Revise the 2<sup>nd</sup> statement under "Pesticide Storage" on page 3 to read "Store in original container in areas inaccessible to persons unfamiliar with its use."
- 5.) Revise the 3<sup>rd</sup> statement under "Container Disposal" statements on page 3 to state "Offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities."
- 6.) Revise the "metal working fluids, water floods, drilling muds/packer fluids/fracturing fluids/completion and workover fluids, gas storage wells/systems, and oil and gas production/transmission pipelines" directions on pages 4-6 to be in compliance with PR Notice 2000-5, Mandatory Labeling, by deleting should and stating "must."

**General Comments**

A stamped copy of accepted label with conditions is enclosed for your records. Submit one (1) copy of your final printed label before distributing or selling the product bearing the revised labeling.

Should you have any questions regarding this letter, please contact Stacey Grigsby by telephone at (703) 305-6440 or by email at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov).

Sincerely,



Jacqueline McFarlane  
 Product Manager, Team 34  
 Regulatory Management Branch II  
 Antimicrobials Division (7510P)

Enclosure: Stamped Label

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# DANTOGARD<sup>®</sup> 2000 PRESERVATIVE

PRESERVING YOUR CONFIDENCE IN THE NEW MILLENNIUM

Contents: LIQUID

Active Ingredients:

1,3-Bis (hydroxymethyl)-5,5-dimethylhydantoin.....	33.2%
Hydroxymethyl-5,5-dimethylhydantoin .....	31.5%
Other Ingredients.....	<u>35.3%</u>
Total .....	100.0%

## KEEP OUT OF REACH OF CHILDREN

# CAUTION

Lonza Inc.  
90 Boroline Road  
Allendale, NJ 07401

Emergency Contact Number: (\_\_\_\_\_)

NET WEIGHT (as marked on container)

EPA Reg. No. 6836-322

EPA Est. # 6836-PA-1

[Country of origin (insert country)]

[Manufactured in (insert country)]

[Barcode]

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

AVG 1 5 2011

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

6836-322

Dantogard 2000 Preservative  
EPA Reg. No. 6836-322  
9-15-10 Oilfield Draft  
EPA Original Stamped 2-4-10

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed, inhaled, or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with skin, eyes or clothing. Wear chemical resistant gloves when using this product. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### 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 eye.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes.

**IF INHALED:** Move person to fresh air. If person is not breathing call 911 or an ambulance, then give artificial respiration preferably by mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a Poison Control Center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Call a poison control center or doctor for 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~~

### 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 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.

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**(Note to reviewer: For Nonrefillable Containers for commercial, industrial, and institutional uses)**

### STORAGE AND DISPOSAL

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

**Pesticide Storage:** Open dumping is prohibited. Store in original container in areas inaccessible to ~~children~~.

#### **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.

**(Note to reviewer: This Container Statement will be used only for containers 5 gallons or less:)**

#### **Container Disposal:**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying.

**(Plastic and Metal Containers:)** Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

**(For metal containers only: DO NOT cut or weld metal containers.)**

**(For Bag in Box Containers:)** Completely empty bag into application equipment. Then offer for recycling if available or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**(Note to reviewer: This Container Statement will be used for containers over 5 gallons:)**

#### **Container Disposal:**

Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying.

**(Plastic and Metal Containers:)** Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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.

**(For metal containers only: DO NOT cut or weld metal containers.)**

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**(Bag in Box Containers:)** Completely empty bag into application equipment. Then offer for recycling if available or dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

## DIRECTIONS FOR USE

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

DANTOGARD 2000 PRESERVATIVE preserves and aids in the control of the growth of bacteria and fungi in liquid detergents, soft soaps, water-based paints for household and Industrial use, room deodorizers and air fresheners, water-based surfactants, polymer emulsions, protective or decorative coatings, water-based gels for household and Industrial products, textiles, water-based inks, and non-food contact water-based adhesives and latex for paper coatings and oil field applications including well bore cleaning products, drilling fluid additives, drilling muds, hydraulic fluids, workover, completion, fracturing and packer fluids, hydrotesting, water flooding, storage wells and systems, oil and gas production and transmission pipelines and systems and pipeline pigging and scraping operations.

### **Industrial and Household Applications**

Add DANTOGARD 2000 PRESERVATIVE to the formulation to be preserved at the rate of 2.3 to 9.4 lbs. per 1000 lbs. or 2300 to 9400 ppm based upon the total weight of the formulation to be protected.

If the above articles have been treated with DANTOGARD 2000 PRESERVATIVE, do not use them as components in materials used in food packaging and food-holding.

DANTOGARD 2000 PRESERVATIVE may be used in metalworking fluids to prevent microbial growth at concentrations of 0.05 – 0.31% in the diluted metalworking fluid. Levels of DANTOGARD 2000 PRESERVATIVE ~~should~~ be checked periodically since many cutting oils are unstable upon standing. Workers should take precautions to minimize inhalation exposure to metalworking fluid mists. OSHA limits for oil mist: Time Weighted Average (TWA = 5 mg/m<sup>3</sup>); Short Term Exposure Limit (STEL = 10 mg/m<sup>3</sup>). Formulators: Add DANTOGARD 2000 PRESERVATIVE to the metalworking fluid concentrate to achieve 0.05 – 0.31% in the diluted metalworking fluid.

### **Oil Field and Petrochemical Operations**

For oil field and petrochemical operations, use in closed delivery systems only.

Dantogard 2000 preserves and aids in the control of sulfate reducing bacteria and general aerobic bacteria, including microorganisms, in oil field recovery, processing, distribution and support systems such as water injection, produced lines, storage tanks and pipelines. Dantogard 2000 is effective for use in controlling microbial growth in

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fluids used in drilling, completion, workover and stimulation of oil wells. **Specific treatment requirements vary among oilfield sites and subsystem components. Oil field fluids and subsystems most commonly requiring microbial contamination control are raw water sources, separators; ballast, storage, and mixing tanks, screens, surface injection equipment, production equipment (including injection and production piping casing, completion, and valving) and the formation itself. The primary point of treatment will vary among oilfield operations depending on the site problems, water-flood treatment methods and equipment.**

**Product addition must be made with a metering pump or similar device. This product must be slug fed, continuously fed, or fed on an intermittent basis depending on the degree of system fouling. The frequency and duration of doses will vary with individual systems and must be established through experience.**

### **Water Floods**

Dantogard 2000 ~~should~~ be added to a water flood system at a point where uniform mixing will occur.

#### Initial Treatment:

When the system is noticeably contaminated, add 2,000 to 7,000 ppm Dantogard 2000 (1.7 to 5.9 gallons Dantogard 2000 per 1,000 gallons flood water) When added to a flowing system, slug dose for 4 – 6 hours based on flow rates. Repeat as necessary until control is achieved.

#### Subsequent Treatment:

Once control has been achieved, add 2,000 – 7,000 ppm Dantogard 2000 (1.7 to 5.9 gallons Dantogard 2000 per 1,000 gallons flood water) to the system weekly, or as needed to maintain control.

#### Continuous treatment:

Dantogard 2000 can be dosed continuously at a level of 750 – 2,000 ppm (0.6 to 1.7 gallons Dantogard 2000 per 1,000 gallons flood water).

### **Drilling Muds, Packer Fluids, Fracturing Fluids, Completion and Workover Fluids**

Dantogard 2000 ~~should~~ be added to these fluids at a point where uniform mixing will occur. Add 1,000 – 7,000 ppm Dantogard 2000 (3.5 to 24.7 gallons Dantogard 2000 per 100 barrels of fluid) to a freshly prepared fluid depending on severity of contamination.

### **Well Bore Cleaning Products, Hydraulic Fluids, Drilling Fluid Additives**

Add 1,000 - 5,000 ppm Dantogard 2000 (3.5 to 17.7 gallons Dantogard 2000 per 100 barrels of fluid) to the formulation to be preserved.

### **Hydrotesting**

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Water used to hydrotest pipelines or vessels should contain 500 – 7,000 ppm Dantogard 2000 (0.4 to 5.9 gallons Dantogard 2000 per 1,000 gallons flood water) depending on water quality and length of time equipment will be idle.

### **Gas Storage Wells and Systems**

Individual injection wells ~~should~~ be treated with 2,000 – 7,000 ppm Dantogard. Injections should be repeated as needed to maintain control.

Individual drips should be treated with a sufficient quantity of Dantogard 2000 to produce a concentration of 1,500 to 5,000 ppm Dantogard 2000 when diluted by the water present in the drip. Injections should be repeated as needed to maintain control.

### **Oil and Gas Production and Transmission Pipelines and Systems**

Dantogard 2000 ~~should~~ be added at a point in the system where uniform mixing will occur. The application should be conducted to ensure maximum distribution of Dantogard 2000 through the entire internal surface of the pipeline. Injections to the system should be weekly, or as needed to maintain control.

#### Slug dose:

For a noticeably fouled system, add 2,000- 10,000 ppm Dantogard 2000 (1.7 to 8.4 gallons Dantogard 2000 per 1,000 gallons flood water) for 4 – 6 hours based on flow rates. Repeat as necessary until control is achieved.

#### Subsequent Treatment:

Once control has been achieved, add 1,500 – 5,000 ppm Dantogard 2000 (1.3 to 4.2 gallons Dantogard 2000 per 1,000 gallons flood water) to the system weekly, or as needed to maintain control.

#### Continuous treatment:

Dantogard 2000 can be dosed continuously at a level of 750 – 2,500 ppm (0.6 to 2.1 gallons Dantogard 2000 per 1,000 gallons flood water).

### **Pipeline Pigging and Scraping Operations**

Add Dantogard 2000 to a slug of water following the scraper. Add Dantogard 2000 at 3,000 - 14,000 ppm (0.3 to 1.2 gallons Dantogard 2000 per 100 gallons water) depending on the length of the pipeline and severity of biofouling.