

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 16, 2025

SENT BY EMAIL

Jennifer Brandon jbrandon@delta-ac.com OSP MICROCHECK INC.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Minor label change to

add optional language for the placement of precautionary statements and directions for use

Product Name: 2K7 BUGSTICK

Admin Number: 67420-1

EPA Receipt Date: 08/13/2025 Action Case Number: 00664370

Dear Jennifer Brandon:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA 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 labeling submitted with this application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Srinivas Gowda by telephone at (202) 565-0078 or via email at gowda.srinivas@epa.gov.

Sincerely,

Steven Snyderman

Steven Snyderman, Product Manager, Team 33 RMB 2, AD
Office of Pesticide Programs

2K7 BUGSTICK [ABN 2K7 SLIMSTICK]

A solid form microbiocide for use in controlling the growth of sulfate reducing and slime forming bacteria in oil and gas processing, metal working fluids and industrial recirculating water. Not for controlling algae in the state of California.

 Active ingredient:
 2-bromo-2-nitropropane-1,3-diol.
 84.5%

 Other Ingredients:
 15.5%

 Total
 100.0%

DANGER

[Note to Reviewer: In accordance with 40 CFR 156.68(d), all first aid statements, as prescribed, will appear on the

front panel of the product label.]

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 first 5 minutes, then continue rinsing eye. 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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 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 treatment advice.
HOT LINE NUMBER	

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical treatment information.

NOTE TO PHYSICIAN - Probable mucosal damage may contraindicate the use of gastric lavage.

[See side panel for additional precautionary statements.]

[See [additional] [precautionary statements] [precautionary labelling] [and] [&] [directions for use] [in] [booklet] [insert]].

[See [side] [back] [panel] [for] [additional] [precautionary statements] [precautionary labelling] [and] [&] [directions for use]]

[See [inside] [booklet] [insert] for [additional] [Precautionary Statements] [and] [&] [Directions for Use]]

EPA REG. NUMBER 67420-1 EPA EST. NUMBER 67420-CN-01

OSP MICROCHECK INC #1, 1715 - 27 AVENUE NE, CALGARY, AB T2E 7E1

NET CONTENTS 13 LB (5.9 KG) - 50 STICKS [2K7 Bugstick] [13 LB (5.9 KG) - 150 STICKS [2K7 Slimstick]]

NOTIFICATION

67420-1

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:

09/16/2025

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed or inhaled. Harmful if absorbed through the skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. For handling activities, use dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any N, R, P, or HE pre-filter. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Coveralls over long sleeved shirt and long pants, socks and chemical-resistant footwear. Goggles or face shield, and chemical-resistant gloves (such as rubber or made out of waterproof material). Do not apply this product in a way that will contact workers or other persons. Wash thoroughly with soap and water after handling. Discard clothing or other absorbent materials that may have been heavily contaminated with the product's concentrate Remove lightly contaminated clothing and wash separately from other laundry using detergent and hot water before reuse.

USER SAFETY REQUIREMENTS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove personal protective equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water by cleaning of equipment or disposal of waste.

PHYSICAL AND CHEMICAL HAZARDS

This product is corrosive to mild steel.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

GENERAL INSTRUCTIONS

2K7 BUGSTICK [2K7 SLIMSTICK] is a solid form microbiocide for use in controlling the growth of sulfate reducing and slime forming bacteria in oil and gas processing, metal working fluids, industrial recirculating water, paint, latex and antifoam systems.

2K7 BUGSTICK [2K7 SLIMSTICK] is typically recommended at 100 ppm active ingredient which is equivalent to 1 stick [3 sticks] per 1000 liters or 264 gallons. For each application area the dose can vary from 15 to 1000 ppm active ingredient. Refer to specific directions for use.

If a heating stage is involved during the manufacturing process add 2K7 BUGSTICK [2K7 SLIMSTICK] when temperature has cooled below 40°C.

OIL AND GAS APPLICATIONS [Not for use in California]

Use a weekly shock dose of 1 stick [3 sticks] per 264 gallons based on the water content of the system until control is achieved. Thereafter, use a maintenance dose, once or twice weekly of 1 stick [3 sticks] per 1056 gallons.

In Gas Wells: apply through the wellhead valving system so product drops down tubing.

In Oil Wells: drop product down tubing when sucker rods are pulled.

In Storage Tanks: drop though thief hatch.

In Oil and Gas Pipeline: drop directly into the water bottom, pipeline or add to the hydrocarbon phase. Treat once daily for pipeline maintenance to once every one or two months for both storage and transportation systems. Apply stick(s) to achieve 25-200 ppm active ingredient in the aqueous phase (2 sticks per 264 gallons is 200 ppm)[(6 sticks per 264 gallons is 200 ppm)]. Add higher concentrations to the hydrocarbon phase, which will result in longer term protection by gradual diffusion into the water phase. Dose will depend on the volume of crude or oil and the expected water fraction.

Re-treat with a weekly shock dose if re-contamination is observed. Do not apply directly with oxygen scavengers, but treat alternatively.

This product may be used in terrestrial and off-shore oil drilling muds and packer fluids.

METAL WORKING FLUIDS [Not for use in California]

2K7 BUGSTICK [2K7 SLIMSTICK] is recommended for use in soluble oils, semi-synthetic and synthetic fluids. It should be added directly to the sump (with agitation) and the system should be circulated for about one hour before shutdown.

Use 3 to 10 sticks [9 to 30 sticks] per 264 gallons of the fluid by applying directly into the sump. A subsequent, weekly dose of 1 stick [3 sticks] per 132 to 264 gallons is recommended to maintain control.

INDUSTRIAL RECIRCULATING WATER [Not for use in California]

2K7 BUGSTICK [2K7 SLIMSTICK] may be dosed directly into the sump or basin or it may be added to the cooling water return at a suitable point. The dosing point should be located where there is adequate flow or turbulence to ensure quick dissolution and rapid dispersal around the system (e.g. the pump outlet from the tower sump).

A shock dose of 1 stick [3 sticks] per 264 gallons should be added to the cooling water once or twice weekly. Thereafter, use a weekly maintenance dose of 1 stick [3sticks] per 528 to 1584 gallons.

PAINTS, LATEX AND ANTIFOAM EMULSION SYSTEMS [Not for use in California]

To provide in-can preservation and inhibit the growth of bacteria in wash waters and during storage of emulsion concentrates and latex emulsion based paints. Also for the preservation of silicone and other antifoam emulsion systems.

2K7 BUGSTICK [2K7 SLIMSTICK] may be added to the aqueous phase at any convenient point during the manufacturing process, preferably where there is product agitation. They may be added as a final step prior to packing of the product into bulk or sales packs, but allowing sufficient time for dissolution and dispersion

Dose 2K7 BUGSTICK [2K7 SLIMSTICK] at 4 to 19 sticks [12 to 57 sticks]/1056 gallons of the final formulation volume.

INDUSTRIAL AND/OR COMMERCIAL AIR WASHERS, AIR CONDITIONING AND HUMIDIFYING SYSTEMS [Not for use in California]

For the control of bacterial and algae growth and to remove slime deposits. Dosing should be carried out into the water sump on a routine basis once per week or month. Heavily fouled systems may require twice weekly treatment.

Initial dose with 1 stick [3 sticks] per 528 gallons. Subsequent dosing can be reduced by half.

Intermittent treatment during regular maintenance and cleaning using 1 stick [3 sticks] per 264 gallons is also recommended with a contact time of at least one hour.

For smaller systems (264 gallons) [(< 45 gallons)] one stick may be broken in half and then added.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep away from heat. **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 DISPOSAL:** Inner package is water soluble. Offer empty outer package for recycling, if available, or dispose of in a sanitary landfill, or by incineration, if allowed by State and local authorities. If burned, stay out of smoke.

[Batch Code]