

70791-3

12/20/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg. Number:

70791-3

Date of Issuance:

DEC 20 2010

Term of Issuance:

Conditional

Name of Pesticide Product:

GeoTru

NOTICE OF PESTICIDE:

- Registration (checked)
Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

EnviroSystems, Inc.
224 Rolling Hill Road / Suite 2A
 Mooresville, NC 28117

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product (OPP Decision No. D-417258) is unconditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment:
a. Revise the "EPA Registration Symbol to read, "EPA Reg. No. 70791-3"
b. You must add a "Physical and Chemical Hazards" section to your label that denotes the reactions of the product with iron and potassium permanganate.
c. The Agency has not adopted a biodegradeable test method to determine whether a product is biodegradeable. Therefore, delete the claims, "Readily Biodegradeable," "contains high % of renewable sources", "Low potential for bioaccumulation" "non accumulative in environment" "will readily deteriorate", "readily degrade" and "GeoTru demonstrated > 60% reduction per OECD 306" on pages 1 and 3.

Signature of Approving Official:

[Handwritten Signature]

Date:

DEC 20 2010

CONCURRENCES

Table with columns for SYMBOL, SURNAME, and DATE, listing Jacqueline Campbell-McFarlane and other regulatory management staff.

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- d. The following statement must appear in the "First Aid" statements "if on clothing or skin" after the "If in eyes" statement.
- e. The "Have a product container..." and "emergency info" statement should appear above the "Note to Physician" because these statements are a part of the "First Aid" section.
- f. Storage and Disposal statements must be revised to reflect:

**Storage and Disposal**

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

Pesticide Storage: Acceptable statements

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill container.

Triple rinse or Pressure as described below. Offer for recycling or reconditioning or dispose of in a sanitary landfill, or by procedures approved by local, state, and federal authorities.

(Containers greater than 5 gallons)

Pressure rinse as follows: Empty the remaining contents into application equipment or mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 20 seconds after the flow begins to drip. Repeat this application 2 more times.

- 2. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. Should you have any questions or concerns regarding this letter, please contact Stacey Grigsby by telephone at (703) 308-6440 or by email at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) or Jacqueline Campbell-McFarlane by telephone at (703) 308-6416 or by email at [Campbell-mcfarlane.jacqueline@epa.gov](mailto:Campbell-mcfarlane.jacqueline@epa.gov).

Sincerely,

*Jacqueline Campbell-McFarlane*  
 Campbell-McFarlane

Product Manager (34)  
 Regulatory Management Branch-H  
 Antimicrobials Division (7510P)

SYMBOL						
SURNAME						
DATE						

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# GeoTru™ [CONCENTRATED] GEOBIOCIDES

Concentrated biocide for the control of microorganisms including algae, fungi\* and bacteria† in oil and gas exploration and production operations including enhanced recovery systems (such as by hydraulic fracturing) and industrial water systems.

NON-FLAMMABLE, NO EXPLOSION HAZARD, NO SPECIAL HANDLING REQUIREMENTS, NOT REACTIVE WITH DOWN-HOLE CHEMISTRIES, SURFACE ACTIVE PROPERTIES, EQUIPMENT COMPATIBLE, CONTAINS A HIGH PERCENTAGE OF RENEWABLE SOURCES, [NON-ACCUMULATIVE IN ENVIRONMENT, [LOW POTENTIAL FOR BIOACCUMULATION], [WILL READILY DETERIORATE], [READILY DEGRADED]

Active Ingredient:

Parachlorometaxylenol.....10%  
Other ingredients.....90%  
Total.....100%

## KEEP OUT OF THE REACH OF CHILDREN

**PRECAUTIONARY STATEMENT: Hazardous to humans and domestic animals.**

**DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear goggles, face shield or safety glasses. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.**

Net Contents: {insert package contents here}

EPA Reg. No. 70791-G  
EPA Est. No. 8340-NC-001

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

DEC 20 2010

{Insert document control number(s) here}

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

70791-3

Note: Bracketed [ ] information is optional text. Text separated by a comma (,) denotes — and/or —options. {Bracketed Text} is for administrative purposes only and will not appear on the printed label.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a Poison control center or doctor for treatment advice.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>• Supply fresh air and call physician.</li> <li>• In case of unconsciousness place person stably in the side position for transportation.</li> </ul>
IF SWALLOWED	<ul style="list-style-type: none"> <li>• Do not induce vomiting.</li> <li>• Call for medical help.</li> <li>• Drink plenty of water, milk or acidic liquid.</li> </ul>
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> <li>• Immediately remove all soiled and contaminated clothing and wash before reuse.</li> <li>• Immediately rinse skin with plenty of water.</li> <li>• Seek medical help if warranted.</li> </ul>
Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.	
Have product container or label with you when calling a Poison Control Center or doctor for treatment advice.	
For Emergency information on [product, use, etc.], call the National Pesticides Information Center at 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven day a week. During other times, call the poison control center at 1-800-222-1222.	

**ENVIRONMENTAL HAZARDS:** Do not discharge effluent containing this product into lakes, streams, ponds, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination system (NPDES) permit and 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.

**STORAGE AND DISPOSAL:** Prevent seepage into sewage systems, work pits and water sources or contact with aquatic environments.

**Pesticide Storage:** Store in a cool place. Keep container securely closed when not in use.

**Pesticide Disposal:** Discard any remaining product or waste resulting from its use in accordance with all local, State and Federal regulations.

**Container Disposal:**

**Non-refillable container:** Do not reuse or refill container. Rinse or pressure rinse container after emptying. Offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by other procedures approved by Local, State or Federal authorities.

**Refillable container:** Refill with GeoTru only. Do not reuse the container for any other purpose. Cleaning before refilling is the responsibility of the refiller. Cleaning of the container before final disposal is the responsibility of the person disposing of the container. Rinse or pressure rinse container after emptying. Offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by other procedures approved by Local, State or Federal authorities.

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**EFFECTIVE AGAINST:** GeoTru can effectively control algae, fungi (*Aspergillus niger*)\* and bacteria<sup>+</sup>, particularly acid-producing bacteria (APB), slime-producing bacteria (SPB), and sulfate-reducing bacteria (SRB).

**DESCRIPTION:** GeoTru is a concentrate intended to be diluted with water for use in oil and gas exploration and production operations including enhanced recovery systems (such as by hydraulic fracturing) and industrial water systems. It can be used in flood water, fracturing fluids, injection waters, pipelines, holding pond water, disposal-well water, tubing, pipelines, pressure vessels, and storage tanks. GeoTru will control bacteria in oil and gas drilling applications and is particularly effective against acid-producing bacteria (APB), slime-producing bacteria (SPB), and sulfate-reducing bacteria (SRB) to prevent corrosion as caused by elevated concentrations of carbon dioxide and hydrogen sulfide. It serves to prevent the degradation of fracing fluids and gels used in oil and gas well stimulations. GeoTru is a chemical emulsion formulation with surface active properties and offers significant advantages. It is easy to handle and ship because of its favorable toxicity profile; it is not reactive with typical down-hole chemistries, requires no special handling and is equipment-compatible. GeoTru contains a high percentage of renewable sources. [GeoTru is non-accumulative in the environment.] [GeoTru has a low potential for bioaccumulation.] [GeoTru is readily degraded.] [GeoTru will readily deteriorate.] [GeoTru demonstrated > 60% reduction per OECD 306.]

**DIRECTIONS FOR USE**

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

**NOTE:** Do not mix it with other chemistries and always use it in a manner consistent with the labeling. Avoid contact with strong oxidizing and reducing agents.

**ENHANCED OIL RECOVERY SYSTEMS:** For controlling microorganism contaminants such as acid-producing bacteria (APB), slime-producing bacteria (SPB), and sulfate-reducing bacteria (SRB). In oil and gas exploration and production operations including enhanced recovery systems (such as by hydraulic fracturing) and industrial water systems, add about 250-5,000 ppm of GeoTru (about 0.25-5 gallons per 1,000 gallons of water) depending on the requirements. Additions should be made with a metering pump either continuously or intermittently and may be made at the free water knockouts, before or after the injection pumps and injection well headers.

**CONTINUOUS FEED METHOD:** For continuous feed, proportion about 250-5,000 ppm of GeoTru (about 0.25-5 gallons per 1,000 gallons of water) with the feed water as the field water conditions dictate.

**INTERMITTENT OF SLUG METHOD:** For intermittent or batch processing, add about 250-5,000 ppm of GeoTru (about 0.25-5 gallons per 1,000 gallons of water) with mixing for 4-8 hours per day, and from 1-4 times per week, or as needed depending on the water conditions.

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Notice: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Manufactured in the USA [by]:  
[Clariant Corporation]  
[625 East Catawba Division]  
[Mount Holly, NC 28120]  
[[www.clariant.com](http://www.clariant.com)]

[for]:  
[EnviroSystems, Inc.]  
[224 Rolling Hill Road, Suite 2A]  
[Mooresville, NC 28117 USA]  
[[www.envirosi.com](http://www.envirosi.com)]

*[A wholly owned subsidiary of Anpath Group, Inc.]*

[™ Trademark of EnviroSystems, Inc.]

NET WT: {insert weight}  
Lot: {insert manufacturing lot number}

Note: Bracketed [] information is optional text. Text separated by a comma (,) denotes — and/or —options. {Bracketed Text} is for administrative purposes only and will not appear on the printed label.