

70791-3

3/3/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

MAR 3 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. J. Lloyd Breedlove
EnviroSystems, Inc.
224 Rolling Hill Road
Suite 2A
Mooresville, NC 28117

Subject: GeoTru™
EPA Registration No.: 70791-3
Application Date: 01/05/2011
Receipt Date: 01/07/2011

Dear Mr. J. Lloyd Breedlove:

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with conditions.

Conditions

Revise the label as follows:

- 1) Revise the formatting and font of "DANGER." "DANGER" must be on a separate line before the precautionary statements. The signal word also must be of a certain point size corresponding to the size of label front panel and bigger than the size of statements around it. Please refer to 40 CFR 156.60 for reference.

- 2) In order to comply with PR 83-3, the Pesticide Disposal statements must be revised to read:

"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."

General Comments

A stamped label with conditions is enclosed for your records. Submit three (3) copies of your final printed label before distributing or selling the product bearing the revised labeling.

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

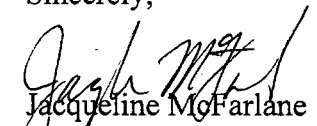
2096

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane.jacqueline@epa.gov or Jaclyn Carl by telephone at (703) 347-0213 or by e-mail at carl.jaclyn@epa.gov.

When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,


Jacqueline McFarlane
Product Manager (34)

Regulatory Management Branch II
Antimicrobials Division (7510P)

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

GeoTru™ [CONCENTRATED] GEOBIOCIDE

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

Active Ingredient:

Parachlorometaxynol.....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. 70791-3
EPA Est. No. 8340-NC-001

{Insert document control number(s) here}

ACCEPTED
with COMMENTS
EPA Letter Dated:
MAR - 3 2011

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.

4096

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 eye. • Call a Poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Immediately remove all soiled and contaminated clothing and wash before reuse. • Immediately rinse skin with plenty of water. Seek medical help if warranted.
IF INHALED	<ul style="list-style-type: none"> • Supply fresh air and call physician. • In case of unconsciousness place person stably in the side position for transportation.
IF SWALLOWED	<ul style="list-style-type: none"> • Do not induce vomiting. • Call for medical help. • Drink plenty of water, milk or acidic liquid.
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.	
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, 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.

PHYSICAL AND CHEMICAL HAZARDS: Avoid contact with strong oxidizing and reducing agents. This product shows reaction with powdered iron and potassium permanganate.

STORAGE AND DISPOSAL: Do not contaminate food, feed, or water by storage or disposal.

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

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:

Non-refillable container: Do not reuse or refill container. Triple rinse or Pressure rinse as described below. Offer for recycling or reconditioning, or dispose of in a sanitary landfill, or by other procedures approved by local, state or 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 the 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.

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.

EFFECTIVE AGAINST: GeoTru can effectively control algae, fungi (*Aspergillus niger*)* and bacteria[†], 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 handing and is equipment-compatible.

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.

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]

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.

6066

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

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

[™ Trademark of EnviroSystems, Inc.]

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