

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 21, 2017

Dr. Connie Welch Authorized Representative for Special Materials Company 70 West 40th Street, 2nd Floor New York, NY 10018

Subject: Label Amendment – Adding Water Floods

Product Name: Avancid 20

EPA Registration Number: 74712-4 Application Date: November 18, 2016

Decision Number: 523995

Dear Dr. Welch:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Terria Northern by phone at 703-347-0265, or via email at northern.terria@epa.gov.

Page 2 of 2 EPA Reg. No. 74712-4 Decision No. 523995

Sincerely,

John Hebert, Chief

Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

Enclosure: Stamped label

AVANCID® 20

FOR INDUSTRIAL USE

Active Ingredient:	
Tetrakis(hydroxymethyl) phosphonium sulfate	20.0%
Other Ingredients:	80.0%
Total:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.						
	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	Take off contaminated clothing.						
Clothing	Rinse skin immediately with plenty of water for 15-20 minutes.						
	Call a poison control center or doctor for treatment advice.						
HOT LINE NUMBER							

HOT LINE NUMBER

IN CASE OF EMERGENCY endangering life or property involving this product, call 800-424-9300. Have product container or label with you when calling a poison control center or doctor or going to treatment.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Maintain adequate ventilation and oxygenation of the patient. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

EPA Reg. No. 74712-4

EPA Est. No. XXXXX-XXX-XXX

Special Materials Company 70 West 40th Street New York, New York 10018

N	let	(Con	ten	ts:						

Lot Number:

ACCEPTED

Feb 21, 2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 74712-4

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eye, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the restroom. Remove and wash contaminated clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates.

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 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.

DIRECTIONS FOR USE

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

OIL FIELD AND PETROCHEMICAL OPERATIONS

AVANCID® 20 is effective in controlling the growth of sulfate reducing bacteria, general aerobic bacteria, and microorganisms that contribute to biofilm formation in oil field recovery, processing and distribution applications and supporting systems; such as injection water, water holding tanks, disposal well water, recirculating water handling systems, and pipelines. AVANCID® 20 has been shown to dissolve iron sulfide and sequester iron when used under these conditions, leading to improvements in pump and filter life, injectivity, oil water separation, and reduction of hydrocarbon sheen. AVANCID® 20 is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil and gas formations.

Produced and Injection Water Treatment (Water Floods) [Not for use in California]

AVANCID® 20 must be added to a produced or injection water system at a point where uniform mixing will occur.

Initial Treatment:

For a noticeably fouled system, add 350-1312 ppm AVANCID® 20. When added to a flowing system, shock dose for 2-6 hours based on flow rates. Repeat as necessary until control is achieved.

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

Subsequent Treatment:

Once control has been achieved, add 52-368 ppm AVANCID® 20 weekly or as needed to maintain control. When added to a flowing system, shock dose for 2-6 hours based on flow rates.

Continuous Treatment:

AVANCID® 20 can be dosed continuously at a level of 50-250 ppm.

Hydraulic Fracturing [Not for use in California]

AVANCID® 20 must be added to the frac water storage tanks or directly into the well head injection pipeline as the water is being pumped downhole. Add 250-1312 ppm of AVANCID® 20, depending on the degree of bacterial contamination in the source water.

Transmission Pipelines and Systems

AVANCID® 20 must be added at a point in the pipeline where uniform mixing will occur. The application must be conducted to ensure maximum distribution of product through the internal surface of the pipeline by adding an amount of biocide which eventually comes out the other end of the pipeline. Criteria for success of the treatment will be reduction in bacterial count and/or corrosion rates.

Slug Dosing:

Follow instructions for injection water treatment.

Continuous Dosing:

AVANCID® 20 can be dosed continuously at a level of 50-375 ppm.

Drilling Muds, Packer Fluids, Completion and Workover Fluids:

Add AVANCID® 20 at a point where uniform mixing will occur. Add 122-5250 ppm of AVANCID® 20 to a freshly prepared fluid depending on severity of contamination.

Gas Storage Wells and Systems [Not for use in California]

Individual wells must be treated in the same manner and at the same application rates as described under Water Floods. Individual drips must be treated with a sufficient quantity of AVANCID[®] 20 to produce a concentration of 125-500 ppm when diluted by the water present in the drip. Repeat as needed to maintain control.

Well Remediation Operations [Not for use in California]

Individual production or injection wells may be bullheaded with AVANCID® 20 to control bacteria and dissolve iron sulfide deposits. Pump the product into the well as an aqueous solution containing from

{All text in brackets [xxx] is optional & may or may not be included on a printed label.}

50%-100% AVANCID® 20. The well must be shut in for at least 6 hours before putting it back into operation.

Hydrotesting

Water used to hydrotest pipelines or vessels must contain 250-2500 ppm AVANCID® 20, depending on water quality and length of time the equipment will remain idle.

Pipeline Pigging and Scraping

Add AVANCID® 20 to a slug of water contained between the scraper and the trailing pig to produce a concentration of 250-2500 ppm in the water at the discharge point or pig trap, depending on the length of the pipe and the severity of biofouling.

INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS (for control of bacteria, fungi, and algae) [Not for use in California]

Note: For cooling water systems of equal to or greater than 4000 gallons, do not apply by open pouring of liquid to cooling water systems; a metering pump delivery system is required for this use and application method.

Initial Slug Dose: Add 350-1312.5 ppm AVANCID® 20 for 2-6 hours based on total water volume. Repeat until control is obtained.

Subsequent Treatment: Add either **intermittently** 130-525 ppm of AVANCID[®] 20 or **continuously** 70-245 ppm AVANCID[®] 20. Dirty systems must be cleaned prior to treatment.

HEAT TRANSFER SYSTEMS (Evaporative Condensors, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, Brewery and Other Pasteurizers, and Warmers).

Add AVANCID® 20 at the same application rates, and in the same manner as described for recirculating cooling water. Add to the system at a point where uniform mixing and circulation throughout the system will occur.

AIR WASHER SYSTEMS (For control of bacterial and fungi) [Not for use in California]

This product must be used only in air washer systems that have mist eliminating components. Preclean the system with detergent and allow air washer to run with fan on for two hours. Flush and check nozzles, manually cleaning as necessary. Add 130-350 ppm AVANCID® 20 at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

MACROFOULING CONTROL [Not for use in California]

AVANCID®20 must be added continuously to maintain a level of 20 ppm active ingredient (THPS) in the system for a period of at least 96 hours. **Initial Dose:** When macrofouling is present in the system, apply 100 ppm AVANCID®20 based on total water volume. Continue to add AVANCID®20 as needed to maintain the 20 ppm active ingredient (THPS) level for a period of at least 96 hours.

FIRE PROTECTION SYSTEMS

AVANCID® 20 is effective at controlling microbial growth in waters and on pipe surfaces in fire protection systems. Such microbial growth when combined with other forms of corrosion can lead to accelerated corrosion rates and pitting corrosion, commonly referred to as microbiologically influenced corrosion. AVANCID® 20 also helps to remove free oxygen from the water, thus eliminating an important nutrient for bacteria and an important reactant in many corrosion reactions.

AVANCID® 20 must be added to a fire protection system using a chemical metering pump. Inject at a point, such as a riser, manifold, or makeup feed water line, where uniform mixing and even distribution will occur. Add 375-1500 ppm AVANCID® 20 depending on severity of contamination in the system. Repeat as needed.

STORAGE AND DISPOSAL

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

STORAGE: Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. Keep container tightly closed when not in use. In case of a spill, flood the area with large quantities of water.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is 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: Nonrefillable container. Do not reuse or refill this container. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.