87636-2 7/17/2014 1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

JUL 17 2014

Kevin R. Kutcel
KRK Consulting, LLC
5807 Churchill Way
Medina, OH 44256

Subject:	Universal Bacteria Specialist Envirolyte
EPA Reg. No.	87636-2
Application Date:	June 13, 2014
Receipt Date:	June 18, 2014

Dear Mr. Kutcel:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification:

- For an alternate brand name (Environlyte O&G)

General Comments:

Based on a review of the material submitted, the following comment applies:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at Henson.Wanda@epa.gov or call (703) 308-6345.

Sincerely,

Wanda Y. Henson
Environmental Protection Specialist
Regulatory Management Branch II
Antimicrobials Division (7510P)

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060 Print Form

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
Universal Bacteria Specialist / 87636-2	Demson Fuller	☒ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
Universal Bacteria Specialist /Envirolyte		

5. Name and Address of Applicant *(Include ZIP Code)*

Universal Bacteria Specialist
PO Box 570324
Houston, TX 77257

☐ *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated _____
☒ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application.
☐ Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Please see cover letter.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	1,5,55,275,330,660 gal	☐ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Kevin R. Kutcel	Agent	440-263-7305

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title
	Agent
4. Typed Name	**5. Date**
Kevin R. Kutcel	Jun 13, 2014

KRK Consulting LLC
5807 Churchill Way
Medina, OH 44256
Tel: 440-263-7305
E-mail: kevinkutcel@gmail.com

June 16, 2014

US EPA (NOTIF)
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: PR Notice 1998-10 Notification for ABN (EPA No. 87636-2)

Please accept the attached 3 copies of the revised label for Reg. No. 87636-2 with the alternate brand name "Envirolyte O&G" per PR Notice 1998-10.

Attached is EPA Form 8570-1 regarding this notification as required in PR Notice 1998-10. This notification is consistent with the guidance in PR Notice 1998-10 and the requirements of EPA's regulations at 40 CFR 156.46, 156.140, 156.144, 156,146 and 156.156 and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand this it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of PR Notice 98-10 and CFR 156.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please note that KRK Consulting LLC is the authorized agent handling all correspondence for Universal Bacteria Specialists and therefore all responses should be directed to the contact information on the letterhead above.

Best Regards,

Kevin R. Kutcel,
Agent for Universal Bacteria Specialists

ENVIROLYTE O & G

4/7

Aqueous Solution of Sodium Chloride

Envirolyte O & G solutions:

- **are cost effective solutions to produce,**
- **can be produced for multiple industrial and commercial applications,**
- **can be produced with a controlled pH and concentration of Free Available Chlorine (FAC),**
- **are produced with low energy cost from water and salt (sodium chloride)**

ACTIVE INGREDIENT:

Hypochlorous Acid..... 0.105%

OTHER INGREDIENTS..... 99.895%

TOTAL..... 100.000%

Contains 1357 ppm Free Available Chlorine (FAC)

KEEP OUT OF REACH OF CHILDREN

Reg. No. 87636-2 **Est. No. 87636-TX-001**

Manufactured by:
Universal Bacteria Specialist
PO Box 570324
Houston, Texas 77257
Ph: 281-342-9555 email cl@universalbacteriaspecialist.com

Envirolyte O & G must be used within 30 days after being produced. DATE PRODUCED:_____

Container Size: (1 gallon, 5 gallon, 55 gallon, 275 gallon tote, 330 gallon tote, 660 gallon tote)

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GENERAL

Envirolyte O & G is produced through the electrolysis of sodium chloride in water. Hypochlorous acid, a weak acid, oxidizing agent, and antimicrobial agent, is produced at the anode. The product at the cathode is sodium hydroxide (lye). In this particular process, Envirolyte O & G is produced at a pH of 6.5 between 6.01 and 8.16.

The properties of Envirolyte O & G can be closely controlled by manipulation of multiple process factors, including the electrolytic cell potential, flow rate, and salt concentration.

Envirolyte O & G will be produced and applied as a liquid with the following physical properties.

- **Freezing point is 32° F**
- **Boiling point is 212°F**
- **Colorless**
- **Slight chlorine odor**

Store Envirolyte O & G in a closed, plastic container in a cool, dark area away from direct sunlight. Envirolyte O & G product must be used within 30 days of production or the FAC (the free available chlorine) will decrease.

DIRECTIONS FOR USE

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

OIL AND GAS APPLICATIONS

Frac Water – For typical water treatment, mix 1.0 gallons of Envirolyte O & G with 1000 gallons of frac water to 1.4 ppm FAC to mitigate and retard the growth of non-public health organisms such as anaerobic bacteria, aerobic bacteria, and sulfate reducing bacteria to protect fracturing fluids, polymers and gels.

Produced Waters – For typical treatment of produced water tanks, add 1 gallon of Envirolyte O & G with 1000 gallons of produced water to 1.4 ppm FAC while rolling volume of tank to retard the growth of non-public health organisms such as anaerobic bacteria, aerobic bacteria, and sulfate reducing bacteria.

Water Flood Injection Wells - For typical water treatment, mix 1 gallon of Envirolyte O & G with 1000 gallons of injection water to 1.4 ppm FAC to mitigate and retard the growth of non-public health organisms such as anaerobic bacteria, aerobic bacteria, sulfate reducing bacteria, and control pipeline slime.

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Sour Wells- For typical well treatment, slug dose 50 gallons of Envirolyte O & G on a daily or weekly basis to control non-public health microorganisms, reduce hydrogen sulfide gas, and microbial influenced corrosion (MIC).

Heater Treaters, Hydrocarbon Storage Facilities and Gas Storage Wells – For typical storage facility treatment mix 1 gallon of Envirolyte O & G with 1000 gallons of water to flow through vessels into storage area to retard the growth of non-public health microorganisms, control the formation of hydrogen sulfide, and reduce corrosion of storage tanks.

Use Sites Associated with Gas and Oil Production

Oil and Gas Wells
Plants and Refineries
Pipelines
Hydraulic Fracturing

PRECAUTIONARY STATEMENTS

Physical or Chemical Hazards: Envirolyte O & G is not compatible with other chemicals such as acids and hydrogen peroxide.

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SPECIALIST

STORAGE AND DISPOSAL

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

For industrial and commercial use packages:
Pesticide Storage: Store in a closed dark plastic container in cool, dry area away from heat and sunlight. Do not store with easily oxidizable materials, acids and reducers. In case of spill, isolate container (if possible) and flood area with large amounts of water to dissolve all material before discarding this container in trash.
Emergency Handling: In case of contamination or decomposition, do not reseal container. Isolate in open, well-ventilated area. Flood with large volume of water. Cool unopened containers in vicinity by water spray.

Pesticide Disposal: Pesticide wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. 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 EPA Regional Office for guidance.

Small Packages (5 gallons or less):
Container Handling: Nonrefillable rigid container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. 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. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay clear of smoke.

For Rigid Nonrefillable Containers 5 gallons or more
Container Handling: Nonrefillable rigid container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. 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. Then offer for recycling or reconditioning if available or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay clear of smoke.

Container Handling: REFILLABLE CONTAINER. Refill this container with Envirolyte **O & G** only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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