

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Antimicrobials Division (7510P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

| PA Reg. Number: | Date of Issuance |
|-----------------|------------------|
| | |

90511-1 3/23/18

NOTICE OF PESTICIDE:

X Registration ___ Reregistration (under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product:

IGL 25 Antimicrobial

3/23/18

Name and Address of Registrant (include ZIP Code):

Imperial Group LLC 631 East Laguna Drive Tempe, AZ 85282

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Antimicrobials 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 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 is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official: Date:

Zeno Bain, Product Manager 33 Regulatory Management Branch I Antimicrobials Division (7510P)

Office of Pesticide Programs

- 2. You are required to comply with the data requirements described in the DCI identified below:
 - a. Glutaraldehyde GDCI-043901-30859

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Reevaluation Team Leader (Team 36): http://www2.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobial-division

- 3. Be aware that proposed data requirements have been identified in a Work Plan. For more information on these proposed data requirements, you may contact the Reevaluation Team Leader (Team 36): http://www2.epa.gov/pesticide-contacts/contacts-office-pesticide-programs-antimicrobial-division
- 4. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
- 5. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 90511-1."
- 6. Submit one copy of the final printed label for the record before you release the product for shipment.

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.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 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. Please also note that the record for this product currently contains the following CSFs:

Basic CSF dated 02/28/2017

If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at heffernan.aline@epa.gov.

Enclosure: Stamped Label

IGL 25 ANTIMICROBIAL

An Effective Microbiocide For Use In Controlling Sulfate-Reducing Bacteria, Fungi (Yeast And Molds), Algae And Slime-Forming Bacteria In Oil And Gas Production And Production Applications, Packer Fluids, Hydrotesting, Oil Field Water Systems, Transmission Pipelines And Systems, Gas Storage Fields And Equipment; Steam-Injection Water Holding Tanks, Flood Water, Fracturing Fluids, Injection Water, Holding Pond Water, Disposal Well Water, Water Holding Tanks, Fuel Storage Tanks And Related Refinery And Oilfield; Closed, Industrial Wastewater Systems.

ACCEPTED

Mar 23, 2018

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 90511-1

DANGER

Keep Out of Reach of Children

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes irreversible eye damage and skin burns. May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid contact with eyes, skin or clothing. Avoid breathing dust, vapor or spray mist. Wear goggles, face shield or safety glasses, long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and chemical-resistant apron. 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. Handle in a well-ventilated area. If vapors are irritating to the nose or eyes, use special ventilation or wear a NIOSH approved particulate respirator, with any R or P filter with NIOSH approval number prefix TC-84A.

| 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 this first 5 minutes, then continue rinsing eye. | |
| | ■ Call a Poison Control Center or doctor for treatment advice | |
| 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. | |
| If Swallowed: | ●Call a poison control center or doctor immediately for treatment advice. | |
| | ◆Do not induce vomiting unless told to do so by a Poison Control Center | |
| | or doctor. | |
| | ◆Do not give anything by mouth to an unconscious person. | |
| 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 further treatment advice. | |

| NOTE to | Probable mucosal damage may contraindicate the use of gastric lavage. |
|------------|---|
| Physician: | |

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information call the National Pesticides Information Center at 1-900-858-7378, 6:30 AM to 4:30 PM Pacific Time (PT), seven days a week. During other times, call the poison control center at 1-800-222-1222.

PHYSICAL AND CHEMICAL HAZARDS

IGL 25 Antimicrobial is incompatible with many commonly used materials of construction such as steel, galvanized iron, aluminum, tin, and zinc.

DIRECTIONS FOR USE

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

FOR CLOSED MIXING AND LOADING SYSTEMS ONLY

Handlers must use a closed system that is designed to prevent dermal and inhalation exposures by removing the product from the container and applying the product via metering pump to the blender. The closed system must function properly and be used and maintained in accordance with the manufacturer's written operating instructions.

WATER FLOODS

Add this product to a drilling fluid system at a point of uniform mixing.

Initial Treatment: When system is noticeably fouled add 200 to 10,000 ppm or 0.2 to 10 gallons of IGL 25 Antimicrobial per 1000 gallons of flood water. Repeat until control is achieved. **Subsequent Treatment:** When control is evident add 40 to 10,000 ppm or 0.2 to 10 gallons of IGL 25 Antimicrobial per 1000 gallons of flood water. Repeat as needed depending on severity of contamination.

PACKER FLUIDS

Add this product to a packer fluid at a point of uniform mixing such as a circulating holding tank. Add 100 to 1200 ppm or 0.40 to 5.0 gallons of IGL 25 Antimicrobial per 100 barrels of fluid to a freshly prepared fluid, depending on the severity of contamination. Seal the treated packer fluid in the wall between the casing and production tube.

DRILLING, COMPLETION, AND WORKOVER FLUIDS

Add this product to a drilling fluid system at a point of uniform mixing such as the circulating mud tank.

Initial Treatment: Add 100 to 2,000 ppm or 0.40 to 8 gallons of IGL 25 Antimicrobial per 100 barrels of fluid to freshly prepared fluid depending on the severity of contamination. **Subsequent Treatment**: Maintain a treatment level of 100 to 2,000ppm or 0.40 to 8 gallons of

IGL 25 Antimicrobial per 100 barrels of fluid. Apply as needed depending on the severity of contamination.

FRAC FLUIDS

Add this product to the frac water storage tanks or directly into the well head injection pipeline as the water is being pumped downhole.

Treatment Dosage: Add this product at a rate of 200 to 10,000 ppm or 0.2 to 10 gallons of IGL 25 Antimicrobial per 1000 gallons of water depending on the severity of bacterial fouling of the source water.

GAS STORAGE WELLS AND SYSTEMS

Treat individual injection wells with a sufficient quantity of this product to produce a concentration of 1,000 to 10,000 ppm of IGL 25 Antimicrobial when diluted by the water present in the formation. If application is made during the summer months, inject IGL 25 Antimicrobial before gas is injected. Repeat injections yearly, or as needed to maintain control. Treat individual drips with a sufficient quantity of this product to produce a concentration of 400 to 4,000 ppm of IGL 25 Antimicrobial when diluted by the water present in the drip. Repeat injections yearly, or as needed to maintain control.

PIPELINE PIGGING AND SCRAPING OPERATIONS

Add this product to minimum amount of water immediately following the scraper and contained between the scraper and a trailing pig. Add at a rate to produce a concentration of 2000 to 20,000 ppm or 0.20 to 2 gallons of IGL 25 Antimicrobial per 100 gallons water, depending on the length of the pipeline and the severity of the contamination

HYDROTESTING

To hydro-test pipelines or vessels maintain a concentration of 200 to 8,000 ppm or 0.20 to 8 gallons of IGL 25 Antimicrobial per 1,000 gallons water, depending on water quality and length of time the equipment will remain idle.

INDUSTRIAL WASTEWATER SYSTEMS

Use IGL 25 Antimicrobial to treat closed wastewater systems, including reverse osmosis systems, sludge and holding tanks. IGL 25 Antimicrobial should be added to a wastewater system or sludge at a point of uniform mixing such as the digester. Add 10.8 to 56 fluid ounces (900 to 4,500 ppm) of IGL 25 Antimicrobial per 100 gallons of wastewater or sludge.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, aquatic invertebrates, oysters and shrimp. 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 local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Flowback and/or produced water MUST NOT be discharged to a Publicly Owned Treatment Water (POTW) facility, but MUST be reused in another oilfield application or disposed of via deep well injection in accordance with local permits.

STORAGE AND DISPOSAL

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

Pesticide Storage: IGL 25 Antimicrobial can be stored and handled in baked phenolic-lined steel, polyethylene, stainless steel, or reinforced epoxy-plastic equipment. This product freezes at about 27 °F (-3 °C). Therefore, unless the storage tank is inside or underground, heating and insulation may be required. If heating is needed, exposure to high temperatures should be avoided. For short storage times (up to about 1 month), temperatures of up to 100 °F (37.8 °C) can be tolerated but the preferred maximum storage temperature is about 80 °F (26.7 °C). A stainless steel centrifugal pump is suggested for transfer service. Spiral-wound stainless steel with TEFLON® polymer is suitable for gaskets and packing.

Pesticide Disposal:

Open dumping is prohibited. Pesticide wastes are toxic. 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 Handling:

<u>Non-Refillable Container</u>: Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

For containers of five gallons or less, 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.

For containers greater than five gallons, triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

<u>Refillable Container</u>: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning of the container is the responsibility of the person disposing of the container. Cleaning the container before refilling is the responsibility of the person refilling the container. To clean the container before final disposal, empty contents into application equipment and triple rinse. Pour or pump rinsate into application equipment or rinsate collection system. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

| EPA Reg. No. 905 EPA Est. | | |
|------------------------------|---------|--|
| Net Contents: | Gallons | |
| MANUFACTURED [BY] [FOR]: | | |
| Imperial Group LLC | | |
| 631 E Laguna Dr | | |
| Tempe, AZ 85282 | | |