



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 2, 2019

Wendy A. McCombie  
Agent  
Imperial Group LLC  
631 East Laguna Drive  
Tempe, AZ 85282

Subject: Label Amendment – Adding Additional Claims  
Product Name: IGL 25 Antimicrobial  
EPA Registration Number: 90511-1  
Application Date: 02/05/2019  
Decision Number: 548911

Dear Ms. McCombie:

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.

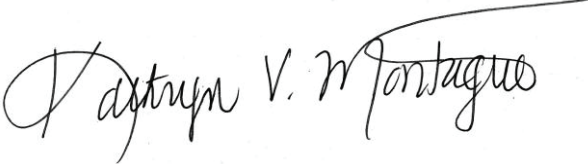
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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

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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](mailto:northern.terria@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathryn Montague, Acting Product Manager 33  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

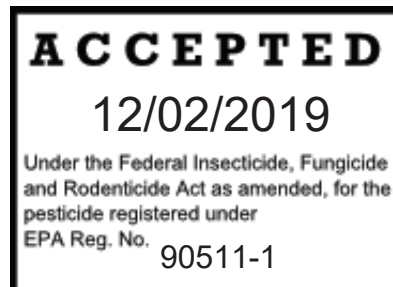
Enclosure: Accepted label

## 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; Air Washers and Industrial Scrubbing Systems; Recirculating Cooling and Process Water Systems Including those that contain Reverse Osmosis Membranes and Service Water and Auxiliary Systems, Heat Transfer Systems

**ACTIVE INGREDIENT:**

Glutaraldehyde.....	25%
OTHER INGREDIENTS:.....	<u>75%</u>
Total.....	100%



### 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	
<b>If in Eyes:</b>	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Call a Poison Control Center or doctor for treatment advice</li> </ul>
<b>If on Skin or Clothing:</b>	<ul style="list-style-type: none"> <li>● Take off contaminated clothing.</li> <li>● Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>● Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If Swallowed:</b>	<ul style="list-style-type: none"> <li>● Call a poison control center or doctor immediately for treatment advice.</li> <li>● Do not induce vomiting unless told to do so by a Poison Control Center or doctor.</li> <li>● Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If Inhaled:</b>	<ul style="list-style-type: none"> <li>● Move person to fresh air.</li> <li>● If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>● Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>NOTE to Physician:</b>	Probable mucosal damage may contraindicate the use of gastric lavage.
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.

### **INDUSTRIAL AND COMMERCIAL WATER SYSTEMS**

#### **AIR WASHERS AND INDUSTRIAL SCRUBBING SYSTEMS/RECIRCULATING COOLING AND PROCESS WATER SYSTEMS**

Use IGL 25 Antimicrobial only in closed loop industrial air washers and air washer systems which have mist-eliminating components. Add IGL 25 Antimicrobial at the application rates described below at point of uniform mixing in the water treatment system such as the basin area. Make the addition intermittently (slug dose) or continuously. Badly fouled systems can be shock treated with IGL 25 Antimicrobial. Under these conditions, blowdown should be discontinued for up to 24 hours.

Use IGL 25 Antimicrobial in closed industrial process water systems that contain ultra-filtration units and non-medical reverse osmosis membranes (where approved for compatibility by the membrane manufacturer) and associated distribution systems.

#### **Intermittent (Slug Dose) Method:**

Initial Dose: When the system is noticeably fouled, add 24 to 48 fluid ounces of IGL 25 Antimicrobial per 1,000 gallons of water in the system. Repeat until control is achieved.  
Subsequent Dose: When microbial control is evident add 9.6 to 24 fluid ounces of IGL 25 Antimicrobial per 1,000 gallons of water in the system weekly, or as needed to maintain control. Badly fouled systems must be cleaned before treatment is begun.

#### **Continuous Feed Method:**

Initial Dose: When the system is noticeably fouled, add 24 to 48 fluid ounces of IGL 25 Antimicrobial per 1,000 gallons of water in the system.  
Subsequent Dose: Maintain this treatment level by starting a continuous feed of 4.8 to 24 fluid ounces of IGL 25 Antimicrobial per 1,000 gallons of water in the system per day. Badly fouled systems must be cleaned before treatment is begun.

### **SERVICE WATER AND AUXILIARY SYSTEMS**

Use IGL 25 Antimicrobial at the same application rates, and in the same manner as described above in closed service water and auxiliary systems. It should be added to the system at a point that will allow for uniform mixing throughout the system.

## **HEAT TRANSFER SYSTEMS (EVAPORATIVE CONDENSERS, DAIRY SWEETWATER SYSTEMS, HYDROSTATIC STERILIZERS AND RETORTS, AND PASTEURIZERS AND WARMERS)**

Use IGL 25 Antimicrobial at the same application rates, and in the same manner as described above in closed heat transfer systems. Add IGL 25 Antimicrobial to the system at a point of uniform mixing such as a basin area, sump area, or other reservoir or collecting area from which the treated water will be circulated uniformly throughout the system.

### **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:**

**Non-Refillable Container:** 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.

Refillable Container: 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. 90511- 1

EPA Est. No.

Net Contents: \_\_\_\_\_ Gallons

**MANUFACTURED [BY] [FOR]:**

Imperial Group LLC

631 E Laguna Dr

Tempe, AZ 85282