



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 21, 2015

Brenda DeShields  
Senior Regulatory Specialist  
Nalco Company, An Ecolab Company  
7705 Highway 90-A  
Sugar Land, TX 77478

Subject: Label Amendment – Adding claims for reduction of bacterial biofilm  
Product Name: EX-6235  
EPA Registration Number: 90924-1  
Application Date: September 11, 2015  
Decision Number: 508861

Dear Ms. DeShields:

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 Tuere Williams by phone at 703-347-0316, or via email at [williams.tuere@epa.gov](mailto:williams.tuere@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Chao". The signature is fluid and cursive, with the first name "Julie" being more prominent than the last name "Chao".

Julie Chao, Product Manager 33  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)  
Office of Pesticide Programs

Enclosure

**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**DANGER: CORROSIVE:** Causes irreversible eye damage and skin burns. May be fatal if inhaled or absorbed through the skin. May be fatal if swallowed. Do not get in eyes, on skin or on clothing. Do not breathe vapor or spray mist. Wear protective eyewear (goggles, face shield, or safety glasses), protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse. Wear a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter which includes NIOSH approval number TC 21C, TC-23C or TC-14G.

**ENVIRONMENTAL HAZARDS**

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 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.

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Product should be kept cool and in a vented container to avoid any explosion hazard.

**NEVER RETURN PRODUCT TO THE ORIGINAL CONTAINER AFTER IT HAS BEEN REMOVED.** Avoid all contaminants, especially dirt, caustic, reducing agents, and metals. Contamination and impurities will reduce shelf life and can induce decomposition. In case of decomposition, isolate container, douse container with cool water and dilute with large volumes of water.

**PESTICIDE DISPOSAL:** 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.

**CONTAINER DISPOSAL: Nonrefillable container.** Do not reuse this container to hold materials other than pesticides or dilute pesticides (rinsate). After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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.**

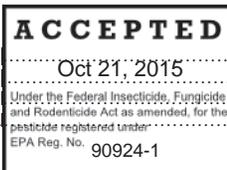
Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning of the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean container before final 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 incineration, or by other procedures allowed by state and local authorities

**RESIDUE REMOVAL INSTRUCTIONS:** For containers greater than 5 gallons. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Fill container 1/4 full with water. Tip container on its side and roll back and forth, ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over its other end and tip back and forth several times. Follow Pesticide Disposal instructions for rinsate disposal. Repeat procedure two more times.

# EX-6235

**ACTIVE INGREDIENT:**

Hydrogen Peroxide.....	3.65%
Peroxyacetic Acid.....	21.0%
<b>OTHER INGREDIENTS:</b> .....	<b>75.35%</b>
<b>TOTAL:</b> .....	<b>100.0%</b>



**KEEP OUT OF REACH OF CHILDREN  
DANGER**

**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 ON SKIN OR CLOTHING:** Take off contaminated 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 for treatment advice. Have a person sip a glass of water if able to swallow. 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 the person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice

**FOR EMERGENCY MEDICAL INFORMATION, CALL TOLL-FREE 1-800-424-9300**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

**FOR Industrial USE  
STRONG OXIDING AGENT**



**Nalco Champion  
7075 Highway 90-A  
Sugar Land, TX 77478**

**EPA Reg. No.: 90924-1  
EPA Est. No.: 68708-TX-1**

Container Size:	55gal	265gal	275gal	330gal	5000gal
Container weight:	508lbs	2449lbs	2541lbs	3049lbs	46200lbs

**DIRECTIONS FOR USE**

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

**For antimicrobial use with aqueous treatment fluids in subterranean oilfield and gas-field well operations such as well drilling, formation fracturing, productivity enhancement and secondary recovery.**

EX-6235 can be used for control of microorganisms commonly found in oilfield systems which can lead to reservoir souring, localized corrosion of metals, biofouling, H2S management and FeS management. This product must be introduced through a closed mixed/loading and delivery transfer system equipped with a metering device that is appropriate for its intended uses.

**DRILLING MUDS, FRACTURING FLUIDS, WELL SQUEEZED FLUIDS**

For the preservation of drilling muds, fracturing fluids, well squeezing fluids, and other product susceptible to contamination, pre-mix with the fluid or add directly at the point of use at 3.75 fluid ounces of the product per 1000 gallons of water (33 mg/l product) to 75.5 fluid ounces of product per 1000 gallons of water (664 mg/l product) as required. Depending on the severity of the contamination, initial application may be added up to 755 fluid ounces of product per 1000 gallons of water (6640 mg/l product). For the reduction of bacterial biofilm, apply 37.5 to 755 ounces of product per 1000 gallons of water (327 mg/L to 6590 mg/L product). For removal of bacterial biofilm, apply 80 to 755 ounces of product per 1000 gallons of water (698 mg/L to 6590 mg/L product).

**FLOODING, INJECTION AND PRODUCED WATER**

For flooding, injection, produced water and other product susceptible to contamination, add initially at 3.75 fluid ounces of product per 1000 gallons of water (33 mg/l product) to 75.5 fluid ounces of product per 1000 gallons of water (664 mg/l product) and repeat until control is achieved. Subsequent treatment may be continued on a weekly basis or as required. Injection wells associated with gas storage systems may be treated up to 139.5 mg/l PAA when diluted in the formation water. Any additional top-up water should be treated as required. For hydrostatic systems, apply 3.75 fluid ounces of product per 1000 gallons of water (33 mg/l product) to 75.5 fluid ounces of product per 1000 gallons of water (664 mg/l product) depending on the water quality and the duration of the shut-in. Depending on the severity of the contamination, initial application may be added up to 755 fluid ounces of product per 1000 gallons of water (6640 mg/l product). For the reduction of bacterial biofilm, apply 37.5 to 755 ounces of product per 1000 gallons of water (327 mg/L to 6590 mg/L product). For removal of bacterial biofilm, apply 80 to 755 ounces of product per 1000 gallons of water (698 mg/L to 6590 mg/L product).

**PIPELINE AND TANK MAINTENANCE**

For microbial control in water-bottoms in crude and refined hydrocarbon storage tanks, piping and transportation systems, apply 3.75 fluid ounces of product per 1000 gallons of water (33 mg/l product) to 75.5 fluid ounces of product per 1000 gallons of water (664 mg/l product) in the aqueous phase, directly injected into the water-bottom, pipeline or may be added to the hydrocarbon phase. Treatment may be applied daily or monthly for both storage and transportation systems as needed. Depending on the severity of the contamination, initial application may be added up to 755 fluid ounces of product per 1000 gallons of water (6640 mg/l product). For the reduction of bacterial biofilm, apply 37.5 to 755 ounces of product per 1000 gallons of water (327 mg/L to 6590 mg/L product). For removal of bacterial biofilm, apply 80 to 755 ounces of product per 1000 gallons of water (698 mg/L to 6590 mg/L product).

In all applications always prepare a new solution daily to ensure effectiveness. Do not re-use solutions. Dispose of unused solution.