

PM 33

4564-15

1/6/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 6 1999

Albright and Wilson Americas, Inc  
P.O. box 4439  
Glen Allen, Virginia 23058-4438

Attn: Eliot I. Harrison, Agent

Subject: Tolcide PS200  
EPA Registration No. 4564-15  
Amendment Dated December 9, 1998

This will acknowledge receipt of your notification to add the word "Corrosive" to the Precautionary Statements section of the label, submitted under the provisions of FIFRA section 3(c)9. Based on a review of the submitted material, the following comments apply.

The notification is in compliance with PR Notice 98-10 (formerly 95-2) and is acceptable. This information has been made a part of your records.

If you have any questions concerning this letter, please contact Martha Terry at 703-308-6217.

Sincerely,



Marshall Swindell  
Product Manager 33  
Regulatory Management Branch 1  
Antimicrobial Division (7510C)

CONCURRENCES

SYMBOL	SURNAME	DATE						

295

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <b>251531</b>
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**Application for Pesticide - Section I**

1. Company/Product Number 4564-15	2. EPA Product Manager Marshall Swindell <i>V-N O B C E</i>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tolcide PS200	PM# 33/33	
5. Name and Address of Applicant (Include ZIP Code) Albright & Wilson Americas P.O. Box 4439 Glen Allen, VA 23058-4439  <input type="checkbox"/> 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**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

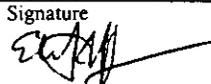
**Explanation:** Use additional page(s) is necessary. (For Section I and Section II.)

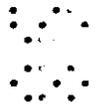
Notification per PR Notice 95-2. Notification adds the word "Corrosive" to the "Precautionary Statements" section of the label. This word was inadvertently omitted from previously approved labels. Notification certification statement is attached.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No  <i>*Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
	If "Yes" Unit Packaging wgt.    No. per container	If "Yes" Package wgt.    No. per container		<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

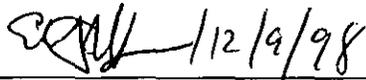
**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Eliot I. Harrison	Title Agent for Albright & Wilson Americas	Telephone No. (Include Area Code) (202) 393-3903
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 for Albright & Wilson Americas	
4. Typed Name Eliot I. Harrison	5. Date December 9, 1998	

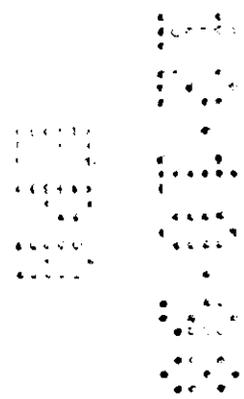


**CERTIFICATION STATEMENT**

This notification is consistent with the provisions of PR Notice 95-2 and EPA regulations at 40 C.F.R. §152.46 and no other changes have been made to the labeling or the CSF of the product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand if this notification is not consistent with the terms of PR Notice 95-2 and 40 C.F.R. §152.46 this product may be in violation of FIFRA and I may be subject to enforcement actions and penalties under sections 12 and 14 of FIFRA.

 12/9/98

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Eliot I. Harrison, Agent for Albright & Wilson Americas



4 2 5

# TOLCIDE® PS200

## INDUSTRIAL ANTIMICROBIAL

ACTIVE INGREDIENT:	
Tetrakis(hydroxymethyl) phosphonium sulfate.....	20%
INERT INGREDIENTS.....	80%
TOTAL: .....	100%

EPA Reg. No. 4564-15

EPA Est. 550-TX-2

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

### STATEMENT OF PRACTICAL TREATMENT

**If in eyes:** Flush immediately with large amounts of clean, cool water for at least 15 minutes. Get medical attention immediately.

**If swallowed:** Promptly drink large quantities of water. Do not induce vomiting. Avoid alcohol. Call a physician immediately.

**If inhaled:** Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

**If on skin:** Wash with plenty of soap and water. Remove contaminated clothing and wash before reuse. Get medical attention. Prolonged or frequent skin contact may cause allergic reactions in some individuals.

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

### PRECAUTIONARY STATEMENTS

#### HAZARD TO HUMANS AND DOMESTIC ANIMALS

**DANGER: Corrosive.** Causes eye damage and skin irritation. Do not get in eyes, on skin or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful if inhaled. Avoid breathing vapor. Remove contaminated clothing and wash before reuse. Harmful or fatal if swallowed. Avoid contamination of food.

### ENVIRONMENTAL HAZARDS

This product is toxic to fish. 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.

### 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. 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 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:** Triple rinse (or equivalent) all containers and offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or other procedures approved by state and local authorities.

**Note:** Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk and/or handling of this material, when such use and/or handling is contrary to label directions.

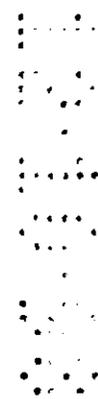
In case of emergency, call CHEMTREC at 1-800-424-9300

Manufactured for:



**ALBRIGHT  
& WILSON**  
Americas

P.O. BOX 4439 • Glen Allen, Virginia 23058-4439 • 804-968-6300



Product of the United Kingdom  
**DIRECTIONS FOR USE**

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

**PAPER MANUFACTURING (for control of bacteria, fungi and algae)**

Not for use in manufacture of paper and paperboard products and adhesives that may come in contact with food.

**Dosing:** Additions should be made at a point in the system where mixing action is good, e.g. raw stock chest beater or mixing unit.

Add intermittently or continuously depending on mill conditions.

**Intermittent Dosing:** Add 122.5-1750 ppm of TOLCIDE PS200 based on total water volume or an equivalent based on dry weight of paper produced.

**Continuous Dosing:** Add 70-245 ppm of TOLCIDE PS200 based on total water volume or an equivalent based on dry weight of paper produced.

**INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS (for control of bacteria, fungi and algae)**

**Initial Slug Dose:** Add 350-1312.5 ppm of TOLCIDE PS200 based on total water volume. Repeat until control is obtained. Thereafter, add either

**Intermittently** 131.25-525 ppm of TOLCIDE PS200 or **Continuously** 70-245 ppm of TOLCIDE PS200 per day.

Dirty systems must be cleaned prior to treatment.

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

Add TOLCIDE PS200 at the same application rates, and in the same manner as described above. It should be added 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.

**AIR WASHER SYSTEMS**

For control of bacteria and fungi. Pre-clean 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 131.25-350 ppm of TOLCIDE PS200 at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

**SOLUTIONS / EMULSIONS**

Not for use in manufacture of paper and paperboard products and adhesives that may come in contact with food. For the preservation of solutions, emulsions, adhesives and other aqueous liquid products, the addition of 0.0875% to 0.875% of TOLCIDE PS200 is effective. Add at a point in the processing system where there will be sufficient time and agitation for good mixing and dispersion. The exact amount of TOLCIDE PS200 to be added for the preservation of given formulations will depend on the components as well as local storage time and requirements.

**OIL FIELD OPERATIONS**

TOLCIDE PS200 is effective in controlling sulfate reducing bacteria, general aerobic bacteria, processing and distribution applications and supporting systems; such as injection water, water holding tanks, disposal well water, recirculating water handling systems, and pipelines. TOLCIDE PS200 has been shown to dissolve iron sulfide and sequester iron when used under these conditions, leading to improved filter life and well injectivity, and reduction of hydrocarbon sheen. TOLCIDE PS200 is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil wells.

**Water Floods**

Tolcide PS200 should be added to a water flood system at a point where uniform mixing will occur.

**Initial Treatment:** For a noticeably fouled system, add 350-1312.5 ppm TOLCIDE PS200. When added to a flowing system, slug dose for 2-6 hours based on flow rates. Repeat as necessary until control is achieved.

**Subsequent Treatment:** Once control has been achieved, add 52.5-367.5 ppm TOLCIDE PS200 weekly or as needed to maintain control. When added to a flowing system, slug dose for 2-6 hours based on flow rates.

**Continuous Treatment:** TOLCIDE PS200 can be dosed continuously at a level of 52.5-250 ppm.

**Oil and Gas Pipelines**

TOLCIDE PS200 should be added at a point in the pipeline where uniform mixing will occur.

**Slug Dosing:** Follow instructions for water flood treatment.

**Continuous Dosing:** TOLCIDE PS200 can be dosed continuously at a level of 52.5-376 ppm.

**Drilling Muds, Packer Fluids, Completion and Workover Fluids**

TOLCIDE PS200 should be added to these fluids at a point where uniform mixing will occur. Add 122.5-5250 ppm of TOLCIDE PS200 to a freshly prepared fluid depending on severity of contamination.

TOLCIDE® is a registered trademark of Albright & Wilson UK Limited.

**NET CONTENTS: As Marked on Container**

34D-1298