

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Rhodia, Inc.
8 Cedar Brook Drive
Cranbury, N.J. 08512-3717

MAR 15 2010

AGENT: Delta Analytical
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Attention: Cristina Griffin

Subject: Tolcide PS50A
EPA Registration No. 4564-17
Amendment Dated February 12, 2010

This will acknowledge receipt of your, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification:

- To update Storage and Disposal language per PR Notice 2007-4

General Comment:

Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable.
This information has been added to your file

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

Sincerely,

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division (7510P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <h1 style="margin:0;">NOTIF</h1>
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Application for Pesticide - Section I

1. Company/Product Number 4564-17	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Rhodia Inc./ Tolcide® PS50A	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Rhodia Inc. c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904		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.)

Notification per PR Notice 2007-4 to update the Storage and Disposal language.

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this 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 that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

Section - III

1. Material this Product will be Packaged in:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted.		If "Yes," Unit Package wgt. No. per container	If "Yes," Unit Package wgt. No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) of Retail Container

5. Location of Label Direction
 On Label
 On Labeling accompanying product

6. Manner In Which Label Is Affixed to Product
 Lithograph Other _____
 Paper glued
 Stenciled

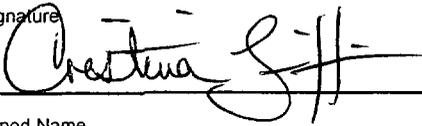
Section - IV

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

Name Cristina Griffin	Title Agent for Rhodia Inc.	Telephone No. (Include Area Code) 301-680-7971
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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 kind of knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Rhodia Inc.	6. Date Application Received (Stamped)
4. Typed Name Cristina Griffin	5. Date February 12, 2010	



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February 12, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S-4900
Arlington, VA 22202

Attn: Marshall Swindell PM 33

RE: Notification per PR Notice 2007-4 to update container language in the Storage and Disposal section for End Use THPS products
Products grouped for cover letter purposes, but each has its own application form for EPA tracking purposes
Company: Rhodia Inc., EPA Reg. Numbers: 4564-15, 4564-17, 4564-18, 4564-20
Company: Rhodia UK Limited, EPA Reg. Numbers: 33677-5, 33677-7
Active Ingredient: Tetrakis (hydroxymethyl) phosphonium sulfate (THPS)

Dear Marshall:

On behalf of Rhodia Inc. and Rhodia UK Limited, I am submitting a notification per PR Notice 2007-4 to update the container language in the Storage and Disposal section for the products listed above. We are grouping the submissions under one cover letter because the products have the same active ingredient, are all for antimicrobial industrial use with the same or very similar use sites and directions, and the storage and disposal language for the products is the same.

Rhodia has contacted its THPS customers in the field and evaluated the applicability of the container language provided in PR Notice 2007-4. We have ascertained that as an industrial use product, with a range of ppm use levels, the PR Notice container directions are appropriate. In fact, end use product customers reported that they already use similar methods for cleaning the container and using the rinsate in the application equipment as discussed in the PR Notice.

As the products are sold in nonrefillable and refillable containers and in bulk, we have included Storage and Disposal language for each scenario on each label.

9/4

On all the master labels enclosed, the Storage and Disposal section is found at the end of the Directions for Use. This is a change for some of the labels. There are no other changes to the labels.

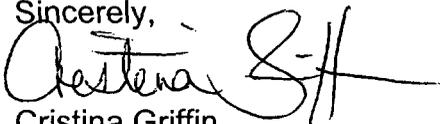
Note: We are not including EPA Reg. No. 33677-6, product name PS355A, because this product is not being sold and Rhodia is planning to cancel the registration in 2011.

Enclosures

- EPA form 8570-1
- 1 copy of the label showing the revised storage and disposal statement

If you have any questions regarding this submission, please contact me at 301-680-7971 or cgriffin@delta-ac.com.

Sincerely,



Cristina Griffin
Agent for Rhodia Inc. and Rhodia UK Limited

Enclosures

cc: Scott Boito

TOLCIDE[®] PS50A

INDUSTRIAL ANTIMICROBIAL

ACTIVE INGREDIENT:

Tetrakis(hydroxymethyl) phosphonium sulfate 50%

OTHER INGREDIENTS: 50%

TOTAL: 100%

EPA Reg. No. 4564-17

EPA Est. 550-TX-2

EPA Est. 80347-TX-1

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID	
<i>If in eyes:</i>	<ul style="list-style-type: none">• 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.
<i>If swallowed:</i>	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have 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.
<i>If inhaled:</i>	<ul style="list-style-type: none">• Move 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 for further treatment advice.
<i>If on skin or clothing:</i>	<ul style="list-style-type: none">• 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.
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.	

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

Manufactured for:



8 Cedar Brook Drive

CN 7500

Cranbury, NJ 08512-7500

Active Ingredient produced in United Kingdom

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

DANGER: Corrosive. Causes irreversible eye damage and skin irritation. Do not get in eyes, on skin or on clothing. Wear long-sleeved shirt and pants or coveralls, goggles or face shield and chemical resistant gloves when handling. Prolonged or frequent skin contact may cause allergic reactions in some individuals. Harmful if inhaled. Avoid breathing vapor. Harmful if swallowed. Wash thoroughly with soap and water before eating and drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse.

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.

DIRECTIONS FOR USE

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

Note: For cooling water systems of equal to or greater than 4000 gallons, do not apply by open pouring of liquid to cooling water systems; a metering pump delivery system is required for this use and application method.

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

Initial Slug Dose: Add 140-525 ppm of TOLCIDE® PS50A (70-262.5 ppm THPS) based on total water volume. Repeat until control is obtained. Thereafter, add either **Intermittently** 52-210 ppm of TOLCIDE® PS50A (26-105 ppm THPS) or **Continuously** 28-98 ppm of TOLCIDE® PS50A (14-49 ppm THPS) 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® PS50A 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.

SERVICE WATER AND AUXILIARY SYSTEMS

TOLCIDE® PS50A should be added to service water and auxiliary systems 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 52-140 ppm of TOLCIDE® PS50A (26-70 ppm THPS) at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

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

a) For use as a slimicide in the manufacture of paper and paperboard products and adhesives that do not contact 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 49-700 ppm of TOLCIDE® PS50A (24.5-350 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced.

Continuous Dosing: Add 28-98 ppm of TOLCIDE® PS50A (14-49 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced.

b) For use as a preservative to retard microbial growth in water-based coatings, starches, pigments and filler slurries. Do not use in paper and paperboard and adhesives that will contact food.

The treatment rate necessary to retard spoilage of the additive will vary with the extent of contamination of make-up water and the length of storage.

Dosing: Apply from 350-1000 ppm of TOLCIDE® PS50A (175-500 ppm THPS) to the additive to be preserved based on the total weight of the additive and water.

INDUSTRIAL FRESH WATER SYSTEMS

Do not use in freshwater used in the manufacture of paper and paperboard products that may contact food. TOLCIDE® PS50A is effective in controlling algae in holding ponds and in controlling bacteria and fungi in holding and processing tanks of industrial fresh water systems supplying water to pulp and paper mills, textile mills, and other manufacturing plants. In pulp and paper mills, treatment of the fresh water with TOLCIDE® PS50A can make an important

contribution to slime control. The use of TOLCIDE® PS50A as described will reduce the development of slime in fresh water pipes and other equipment, and on the pulp and paper mill machine parts contacted by fresh water.

For the control of algae in industrial fresh water systems, TOLCIDE® PS50A should be added to provide a concentration of 2-20 ppm of product (1-10 ppm THPS). Treatment should be based on the amount of water entering a pond or reservoir or leaving the pond or reservoir and entering the immediate processing operations. While treatment can be made continuously, regular slug-dosing treatment will provide adequate control.

INDUSTRIAL WASTEWATER SYSTEMS (Wastewater Systems, Wastewater Sludge and Wastewater Holding Tanks)

TOLCIDE® PS50A should be added to a wastewater system or sludge at a convenient point of uniform mixing such as a digester. Add 500-2500 ppm of TOLCIDE® PS50A (250-1250 ppm THPS) per 1,000 gallons of wastewater or sludge.

MACROFOULING CONTROL

TOLCIDE® PS50A should be added continuously to maintain a level of 20 ppm active ingredient (THPS) in the system for a period of at least 96 hours.

Initial Dose: When macrofouling is present in the system, apply 40 ppm of TOLCIDE® PS50A (20 ppm THPS) based on total water volume. Continue to add TOLCIDE® PS50A as needed to maintain the 20 ppm active ingredient (THPS) level for a period of at least 96 hours.

FIRE PROTECTION SYSTEMS

TOLCIDE® PS50A is effective at controlling microbial growth in waters and on pipe surfaces in fire protection systems. Such microbial growth when combined with other forms of corrosion can lead to accelerated corrosion rates and pitting corrosion, commonly referred to as microbiologically influenced corrosion. TOLCIDE® PS50A also helps to remove free oxygen from the water, thus eliminating an important nutrient for bacteria and an important reactant in many corrosion reactions.

TOLCIDE® PS50A should be added to a fire protection system using a chemical metering pump capable of variable pump rates. The TOLCIDE® PS50A should be injected at a point, such as a riser, manifold or makeup feed water line, where uniform mixing and distribution will occur. Add 150-600 ppm TOLCIDE® PS50A (75-300 ppm THPS) depending on severity of microbial contamination in the system. Repeat as needed.

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 0.035% to 0.350% of TOLCIDE® PS50A (0.0175-0.175% THPS) 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® PS50A to be added for the preservation of given formulations will depend on the components as well as local storage time and requirements.

OIL FIELD AND PETROCHEMICAL OPERATIONS

TOLCIDE® PS50A is effective in controlling sulfate reducing bacteria, general aerobic bacteria, including microorganisms that contribute to biofilm formation in oil field recovery, processing and distribution applications and supporting systems; such as injection water, water holding tanks, disposal well water, recirculating water handling systems, and pipelines. TOLCIDE® PS50A 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® PS50A is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil wells.

Water Floods

TOLCIDE® PS50A should be added to a water flood system at a point where uniform mixing will occur.

Initial Treatment: For a noticeably fouled system, add 140-525 ppm TOLCIDE® PS50A (70-262.5 ppm THPS). 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 21-147 ppm TOLCIDE® PS50A (10.5-73.5 ppm THPS) 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® PS50A can be dosed continuously at a level of 21-100 ppm (10.5-50 ppm THPS).

Oil and Gas Production and Transmission Pipelines and Systems

TOLCIDE® PS50A should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of TOLCIDE® PS50A through the entire internal surface of the pipeline by adding an amount of biocide which eventually comes out the other end of the pipeline. Criteria for success of the treatment will be reduction in bacterial count and/or corrosion rates.

Slug Dosing: Follow instructions for water flood treatment.

Continuous Dosing: TOLCIDE® PS50A can be dosed continuously at a level of 21-150 ppm (10.5-75 ppm THPS).

Drilling Muds, Packer Fluids, Completion and Workover Fluids

TOLCIDE® PS50A should be added to these fluids at a point where uniform mixing will occur. Add 49-2100 ppm of TOLCIDE® PS50A (24.5-1050 ppm THPS) to a freshly prepared fluid depending on severity of contamination.

Gas Storage Well and Systems

Individual injection wells should be treated with TOLCIDE® PS50A at the same application rates, and in the same manner as described under Water Floods. Injections should be repeated as needed to maintain control.

Individual drips should be treated with a sufficient quantity of TOLCIDE® PS50A to produce a concentration of 50-200 ppm TOLCIDE® PS50A (25-100 ppm THPS) when diluted by the water present in the drip. Injections should be repeated as needed to maintain control.

Hydrotesting

Water used to hydrotest pipelines or vessels should contain 100-1000 ppm TOLCIDE® PS50A (50-500 ppm THPS), depending on water quality and length of time the equipment will remain idle.

Pipeline Pigging And Scraping Operation

Add TOLCIDE® PS50A to a slug of water immediately following the scraper (ideally this water volume can be kept to a minimum and contained between the scraper and a trailing pig). Sufficient TOLCIDE® PS50A should be added to produce a concentration of 0.01% to 0.1% (50-500 ppm THPS) in the water at the discharge point or pig trap, depending on the length of the pipeline and the severity of biofouling.

STORAGE AND DISPOSAL

[For rigid non-refillable containers 5 gallons or less:]

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 HANDLING AND DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling or reconditioning if appropriate. 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 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. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

[For rigid nonrefillable containers greater than 5 gallons:]

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 HANDLING AND DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling or reconditioning if appropriate. 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 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. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

[For refillable containers:]

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 HANDLING AND DISPOSAL: Refillable container. Refill this container with THPS only. Do not reuse this container for any other purpose. Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Pressure rinse the container for final disposal as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

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[For Bulk Shipment Transport Vehicles: Note: In accordance with 40CFR 156 (e) bulk shipment transport vehicles are exempt from the requirements for container handling and disposal, therefore, only pesticide storage and disposal is required on bulk transport vehicle labeling]

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.

[All products must bear a batch code. This is a lot number or other code used by the registrant or producer to identify the batch of the pesticide product distributed and sold. Location may be on the container or the label.]

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.

TOLCIDE® is a registered trademark of Rhodia UK Limited.

NET CONTENTS: As Marked on Container

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