

4564-17

(9/20/2012)

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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

SEP 20 2012

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

Attention Cristina Griffin Agent

Subject Tolcide PS50A
EPA Registration No 4564 17
Notification Dated August 20 2012

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

Proposed Notification

- To add reader s notes to footer of label

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

A handwritten signature in cursive script, appearing to read "Marshall Swindell".

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

**EPA**
 United States
Environmental Protection Agency
 Washington DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

NOTIF**Application for Pesticide Section I**1 Company/Product Number **4564 17**2 EPA Product Manager
Marshall Swindell

3 Proposed Classification

☐ None ☐ Restricted4 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

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☐ 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 98 10 to add reader s notes to footer of label**

This notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152.46 and no other changes have been made to the labeling or the confidential statement of formula of 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 this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 152.46 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

☐ Yes
☐ No

Unit Packaging

☐ Yes
☐ No

Water Soluble Packaging

☐ Yes
☐ No

2 Type of Container

☐ Metal
☐ Plastic
☐ Glass
☐ Paper
☐ 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
☐ Paper glued
☐ Stenciled
☐ Other _____**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**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

4 Typed Name

Cristina Griffin

5 Date

August 20 2012

6 Date Application Received

(Stamped)



August 20 2012

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 98 10 to add reader s notes to footer of label
Product Tolcide PS50A
EPA Reg No 4564 17
Company Rhodia Inc

Dear Mr Swindell

On behalf of Rhodia Inc I am submitting a notification per PR Notice 98 10 to add reader s notes to the footer of the label for Tolcide® PS50A EPA Reg No 4564 17 This is the only change to the label since the last EPA approved label dated 10/27/11 The reader s notes are highlighted and appear as follows

[In the text this product or alternate brand name may be substituted for Tolcide®PS50A product name] [Information in brackets[] is optional or instructional italics in brackets indicate instructions not part of labeling]

This addition of reader s notes is being submitted as a notification for all 7 Rhodia Tolcide labels (EPA Company No 4564 and 33677)

Enclosures

EPA form 8570 1

1 copy of the revised label with changes highlighted

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

Enclosures

cc Judith Kranetz Rhodia

12510 Prosperity Drive Suite 160 Silver Spring Maryland 20904
(301) 680 7971 fax (301) 680 7975 www.delta ac com

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TOLCIDE® PS50A

INDUSTRIAL ANTIMICROBIAL

ACTIVE INGREDIENT

Tetrakis(hydroxymethyl) phosphonium sulfate 50 /

OTHER INGREDIENTS

50 /

TOTAL

100 %

EPA Reg No 4564 17

EPA Est 80347 TX 1

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 swallowed	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
If inhaled	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
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
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 1 800 858 7378 7 30 AM to 3 30 PM Pacific time (PT) Mon – Fri During other times call the poison control center at 1 800 222 1222 Note to physician Probable mucosal damage may contraindicate the use of gastric lavage	

See Side Panels for Additional Precautionary Statements

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

Manufactured for



RHODIA INC

8 Cedar Brook Drive

CN 7500

Cranbury NJ 08512 7500 609 860 4000

Active ingredient produced in United Kingdom and/or China

NOTIFICATION
Reviewed 6/25/12
By [Signature]

NET CONTENTS As Marked on Container

[Box and bullet format for FIRST AID section is optional]

[In the text this product or alternate brand name may be substituted for TolcideOPS50A product name]

[[Information in brackets]] is optional or instructional italics in brackets indicate instructions not part of labeling]

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

DANGER Corrosive Causes irreversible eye damage May be fatal if swallowed Harmful if inhaled Harmful if absorbed through skin Do not get in eyes on skin or on clothing Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals Avoid breathing vapor or spray Wear long sleeved shirt and pants or coveralls goggles or face shield and chemical resistant gloves when handling 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

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 Not for use in paint

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

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

Initial Slug Dose Add 80 525 ppm of TOLCIDE® PS50A (40 262 5 ppm THPS) for 2 6 hours 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) [Not for use in California]

This product may be used only in air washer systems which have mist eliminating components 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 [Not for use in California]

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 [Not for use in California]

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

[In the text 'this product' or alternate brand name may be substituted for Tolicide®PS50A product name]

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For the control of algae in industrial fresh water systems TOLCIDE® PS50A should be added to provide a concentration of 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)

[Not for use in California]

TOLCIDE® PS50A should be added to a wastewater system or sludge at a convenient point of uniform mixing such as digester

Slug Dosing Add 80 525 ppm of TOLCIDE® PS50A (40 262 5 ppm THPS) per 1 000 gallons of wastewater or sludge

Continuous Dosing Add 2-40 ppm of TOLCIDE® PS50A (1 20 ppm THPS) per 1 000 gallons of wastewater or sludge

MACROFOULING CONTROL [Not for use in California]

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 [Not for use in California]

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 10 147 ppm TOLCIDE® PS50A (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 10 100 ppm (5 50 ppm THPS)

Hydraulic Fracturing [Not for use in California]

TOLCIDE® PS50A should be added to the frac water storage tanks or directly into the well head injection pipeline as the water is being pumped down hole Add 100 525 ppm of TOLCIDE® PS50A (50 262 5 ppm THPS) depending on the degree of bacterial fouling in the source water

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)

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NOTIFICATION
Date Reviewed 8/30/12
Reviewed By [Signature]

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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 [Not for use in California]

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.

Well Remediation Operations [Not for use in California]

Individual production or injection wells may be bullheaded with TOLCIDE® PS50A to control bacteria and simultaneously dissolve iron sulfide deposits. The TOLCIDE® PS50A will be pumped into the well as a solution in water containing from 20% to 40 % TOLCIDE® PS50A (10% 20 / THPS). The well is shut in for a period of time (at least 6 hours) then put back into operation.

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 / 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 / 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.

[In the text 'this product' or alternate brand name may be substituted for Tolcide®PS50A product name]

[[Information in brackets]] is optional or instructional. Italics in brackets indicate instructions not part of labeling.]

[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

[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 To the extent consistent with applicable law seller makes no warranty expressed or implied concerning the use of this product other than indicated on the label To the extent consistent with applicable law buyer assumes all risk of use 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

NOTIFICATION
Date Reviewed 2/24/12
Reviewed By [Signature]

[In the text this product or alternate brand name may be substituted for Tolcide®PS50A product name]

[[Information in brackets] is optional or instructional italics in brackets indicate instructions not part of labeling]