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



SEPA United Stafes Environmental Protection Office of Pesticide Programs Agency

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

MAR 1 5 2010

AGENT: Delta Analytical

12510 Prosperity Drive, Suite 160

Silver Spring, MD 20904

Attention: Cristina Griffin

Subject: Tolcide® MBT

EPA Registration No. 33677-1

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 Swindel

Product Manager 33

Regulatory Management Branch I Antimicrobials Division (7510P)

	A	-			
rm	Approv€	MB	No.	2070-0	006

United States

☐ Registration
□ Amendment
Y Other

OPP Identifier Number

		Protection Agency Ame X Othe		ment	NOTIF		
		Application for P	esticide - Section I				
1. Company/Product Number 33677-1			2. EPA Product Manager Marshall Swindell		3. Proposed Classification □ None □ Restricted		
4. Company/Product (Name) Rhodia UK Limited / Tolcide® MBT			РМ# 33		S Note B Note of		
5. Name and Address of Applicant (Include Rhodia UK Limited c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 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						
		Sect	ion - II				
☐ Amendment - Explain below ☐ Resubmission in response to Agency lett X Notification - Explain below.	☐ Final printed labels in response to Agency letter dated						
Explanation: Use additional page(s) if near	cessary. (For s	ection I and Section II.)			•		
Notification per PR Notice 2007-	4 to update	the Storage and Dis	posal language.				
Notification of label change per PR EPA's regulations at 40 CFR 156.10. Statement of Formula for this productive regulation of the second further understand that if the amendation product may be in violation of F	. 156.140, 156 ict. I unders led label is n	5.144, 156.146, and 156. tand that it is a violatior ot consistent with the r	156. No other changes had n of 18 U.S.C. Sec. 1001 to requirements of 40 CFR 15	ve been made willfully make i6.10. 156.140,	to the labe any false s 156.144, 15	ling or the Confidential tatement to EPA. I 56.146, and 156.156,	
		Sect	ion - III				
Material this Product will be Package	ed in:	······································					
Child-Resistant Packaging ☐ Yes* ☐ No	d-Resistant Packaging □ Yes* Unit Packaging □ Yes		Water Soluble Packaging □ Yes □ No		2. Type of Container ☐ Metal ☐ Plastic ☐ Glass		
* Certification must be submitted.	lf "Yes," Unit Package	e wgt. No. per container	If "Yes," Unit Package wgt. No. pe	☐ Paper ☐ Other (Specify)			
3. Location of Net Contents Information 4. Size(s) of Retail Contain □ Label □ Container			5. Location of Label Direction ☐ On Label ☐ On Label ☐ On Labeling accompanying product				
6. Manner In Which Label Is Affixed to Prod	Other						
		Sect	ion - IV				
Contact Point (Complete items directly b	elow for identifi	cation of individual to be cor	ntacted, if necessary, to process	this application.,)		
Name Cristina Griffin			Title Agent for Rhodia UK Limited		Telephone No. (Include Area Code) 301-680-7971		
I certify that the statements I have made or of knowingly false or misleading statement			rue, accurate and complete. I a	cknowledge that	any kind	6. Date Application Received	
2. Signature			3. Title Agent for Rhodia UI	K Limited ိ်	(((((((((((((((((((ို့ (Stamped)	
4. Typed Name Cristina Griffin			5. Date February 12, 2010	C 0	(



February 12, 2010

1. Fr.

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 Manufacturing Use THPS and MBT products

Products grouped for cover letter purposes, but each has its own application form for EPA tracking purposes

Company: Rhodia Inc., EPA Reg. Numbers: 4564-19

Company: Rhodia UK Limited, EPA Reg. Numbers: 33677-1, 33677-3 Active Ingredient: Tetrakis (hydroxymethyl) phosphonium sulfate (THPS)

and Methylene bis (thiocyanate) (MBT)

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 are all for the formulation of industrial microbiocides/preservatives and we have used same the storage and disposal language for each.

The container language used on the labels is consistent with container language EPA has approved on some other antimicrobial labels and therefore this submission meets the requirements of PR Notice 2007-4. For these manufacturing use products, the container directions differ slightly from the specific language in the PR Notice, since the product rinsate cannot be poured into application equipment. Instead, Rhodia is using language found on other EPA approved antimicrobial labels which state that the rinsate is to be disposed of consistent with pesticide disposal instructions (which are above the container handling section).

As the products are sold in nonrefillable and refillable containers and in bulk as well as various sizes, we have included Storage and Disposal language for each scenario. There are no other changes to the labels.

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

FOR FORMULATION OF INDUSTRIAL MICROBICIDES AND PRESERVATIVES

FIRST AID

IF IN EYES, hold eve 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. Call a Poison Control Center or doctor immediately for treatment advice.

IF ON SKIN, take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor immediately for treatment.

IF INHALED, move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration. preferably mouth-to-mouth, if possible. Call a Poison Control Center or doctor immediately for further treatment.

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 by a Poison Control Center or doctor

Have the product container or label with you when calling a Poison Control Center or doctor.

Note to physician: Probable mucosal damage may contraindicate use of gastric gavage. Precautions for shock respiratory depression and convulsion may be needed.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive. Causes irreversible eve damage and skin burns. Fatal if inhaled. May be fatal if swallowed. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash hands before eating, drinking, chewing gum, using tobacco or using the

Formulators and other handlers must wear: Long-sleeve shirt and long pants, shoes plus socks, protective eyewear (goggles or face shield), protective respiratory device, chemical-resistant apron. and chemical-resistant gloves. Wear a dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or NIOSH approved respirator with any N, R, P or HE filter. Users should remove PPE immediately after handling this product. Wash the outside of the goves before removing. As soon as possible, wash thoroughly and change into clean clothing. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no instructions for washables, use detergent and hot water. Keep and ewash PRE separately from other laundry. If pesticide gets inside ີ່ clothing, remove clothing immediately, wash thoroughly, and put on clean flothing. Carefully discard clothing or other absorbent materials that have been heavily contaminated with this product. Do not reuse them.

ACTIVE INGREDIENT:	
Methylene bis(thiocyanate)	99%
INERT INGREDIENTS	1%
TOTAL	100%

EPA Reg. No. 33677-1

EPA Est. 73646-IND-001

KEEP OUT OF REACH OF CHILDREN **DANGER**



POISON

See Side Panels for Precautionary Statements In case of emergency, call CHEMTREC at 1-800-424-9300

Manufactured by:

RHODIA UK LIMITED Trinity Street - Oldbury West Midlands - United Kingdom B69 4WD Product of United Kingdom

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.

PHYSICAL AND CHEMICAL HAZARDS

Reacts violently with strong bases and strong oxidizing agents. Will decompose slowly above 230 °F (110 °C) and rapidly above 401 °F (205 °C), releasing toxic gases. Avoid comminution (pulverization) and dusting.

DIRECTIONS FOR USE

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

For formulatory use only.

Formulators are responsible for providing data to support registration of products formulated from this active ingredient. Formulators are responsible for retaining their own licences for any uses or formulations for this material covered by patents. This label is not to be taken as license to operate under or recommendation to infringe any patent.

STORAGE AND DISPOSAL

[For [Manufacturing Use Product] non 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: Nonrefillable container. Do not reuse or refill this container. Triple rinse promptly after emptying. Triple rinse as follows: Fill the container ½ full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer container for recycling or reconditioning if appropriate or puncture and dispose in sanitary landfill or incineration. If r triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations.

Spills: When handling or dealing with spills, wear protective eyewear, approved respiratory protection device, protective clothing, chemical-resistant gloves and boots. Sweep or shovel up dry spills, taking care to avoid creating a dust, and dispose of as described for pesticide disposal. If container contents are contaminated or decomposing, do not reseal container; isolate unsealed container in the open or in a well-ventilated area.

[see next page [back panel] for additional storage and disposal]

[For [Manufacturing Use Product] 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. Cleaning 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 the container before final disposal triple rinse as follows. Fill the container 1/2 full with water and reclose the container. Agitate vigorously, and dispose of rinsate consistent with pesticide disposal instructions. Repeat two more times. Then offer container for recycling or reconditioning if appropriate or puncture and dispose in sanitary, landfill or incineration. If not triple rinsed, these containers are acute hazardous wastes and must be disposed in accordance with local, state, and federal regulations:

[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: 50 KG (110.2 Lbs)