

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® PS75
EPA Registration No. 33677-3
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,

A handwritten signature in cursive script, appearing to read "Martha Terry" or "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 33677-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Rhodia UK Limited / Tolcide® PS75	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Rhodia UK Limited c/o Delta Analytical Corp. 12510 Prosperity Drive, Suite 160 Silver Spring, MD 20904 <i>Check if this is a new address</i>	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 <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) of Retail Container	5. Location of Label Direction <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"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> 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 UK Limited	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.		6. Date Application Received
2. Signature 	3. Title Agent for Rhodia UK Limited	(Stamped)
4. Typed Name Cristina Griffin	5. Date February 12, 2010	



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 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.

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

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

cc: Scott Boito

TOLCIDE® PS75

FOR FORMULATION OF INDUSTRIAL MICROBICIDES AND PRESERVATIVES

Used in air conditioner/refrigeration condensate water systems, air washer systems, recirculating commercial/industrial water cooling systems, heat exchanger water systems, paper and paperboard manufacturing, industrial processing water, industrial freshwater systems, industrial wastewater systems, fire protection systems, service water and auxiliary systems, solutions/emulsions, laboratory equipment water baths, oil field operations and systems, and drilling muds/packer fluids.

ACTIVE INGREDIENT:

Tetrakis(hydroxymethyl) phosphonium sulfate 75%

OTHER INGREDIENTS: 25%

TOTAL: 100%

EPA Reg. No. 33677-3

EPA Est. 33677-GBR-2

EPA Est. 80347-TX-1

KEEP OUT OF REACH OF CHILDREN DANGER

FIRST AID	
If in eyes:	<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.
If swallowed:	<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.
If inhaled:	<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.
If on skin or clothing:	<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 by:



RHODIA UK Limited
Trinity Street – Oldbury
West Midlands – United Kingdom B69 4WD
Product of the United Kingdom

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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 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 or fatal if swallowed. Avoid contamination of food. 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.

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 licenses 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 ¼ 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 [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 ¼ 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.

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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.]

TOLCIDE® is a registered trademark of Rhodia UK Limited.

NET CONTENTS: As Marked on Container