

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 20 2001

Rhodia, Inc.  
P.O. Box 4439  
Glen Allen, VA 23058-4439

**AGENT: Eliot Harrison**  
**Lewis and Harrison**  
**122 C Street, N.W. Suite 740**  
**Washington, D.C. 20001**

Subject: Tolcide PS352C  
EPA Registration No. 33677-5  
Letter Dated November 29, 2001

The amendment dated September 17, 1999, submitted in connection with registration under FIFRA section 3(c)(7)(B), was accepted December 23, 1999 on a 2-year time limited basis. The registration for the use of this product in the manufacture of food contact paper and paperboard expires on December 23, 2001. Based upon your letter dated November 29, 2001, you are requesting an extension of the expiration date to March 31, 2002. Due to the deficiencies noted in the review of your Production Study and the recent submittal of an Exposure Analysis to support a waiver of the Residue Migration study, a time extension is being granted until June 1, 2002 to allow the Agency sufficient time to review your waiver request and your response to the deficiencies in your Reproduction Study. In order for the registration of this use to continue the conditions listed below must be satisfied.

1. The following data must be submitted and found acceptable by June 1, 2002.

- a. A two Generation Reproduction Study, in rats.  
See the attached science review for this study. The study is unacceptable, but upgradable.
- b. A Residue Migration Study must be submitted using the FDA guidance document and the appropriate food simulating solvents. This study should be conducted using "we end" procedure for making paper and paper board using a validated analytical method. Alternatively, an acceptable waiver request will suffice.

2. Submit and/or cite all data required for the registration/reregistration of your product under FIFRA sec. 3(c)(5) and sec. 4 when the Agency requires all registrants of similar product to submit such data.

## CONCURRENCES

SYMBOL								
SURNAME								
DATE								

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This registration for this use automatically expires on June 1, 2002. In order for the registration of the use of this product to manufacture food contact paper and paperboard to continue, the data described in item 1 above must be submitted, reviewed, and found acceptable. In addition, the Agency must make a determination under FIFRA section 2(bb)(2) that this use will not result in unreasonable adverse effects. If the Agency is unable to make this determination, then the registration of the food contact paper and paperboard use will expire.

A stamped copy of the labeling is enclosed for 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  
Antimicrobials Division (7510C)

Enclosure

# TOLCIDE® PS352C

## INDUSTRIAL ANTIMICROBIAL

### ACTIVE INGREDIENT:

Tetrakis(hydroxymethyl) phosphonium sulfate..... 35%

INERT INGREDIENTS:..... 65%

TOTAL:..... 100%

EPA Reg. No. 33677-5

EPA Est. 550-TX-2

**KEEP OUT OF REACH OF CHILDREN**

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

**DANGER**

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### 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.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 33677-5

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 by:

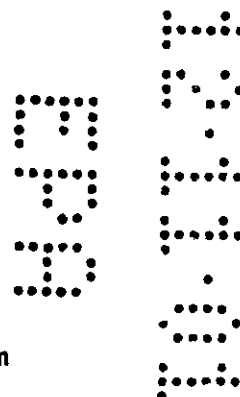
**Rhodia**

RHODIA CONSUMER SPECIALTIES LIMITED

Trinity Street • Oldbury • West Midlands B69 4WD • United Kingdom

Product of the United Kingdom

NET CONTENTS: As Marked on Container



## DIRECTIONS FOR USE

4/4  
ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

DEC 20 2001

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)**

a) For use as a silicicide 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 70-1000 ppm of TOLCIDE PS352C (24.5-350 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced.

**Continuous Dosing:** Add 40-140 ppm of TOLCIDE PS352C (14-49 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced.

b) For use as a silicicide in the manufacture of paper and paperboard products that may 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 70-240 ppm of TOLCIDE PS352C (24.5-84 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced. The maximum use concentration of THPS in the slurry cannot exceed 84 ppm.

**Continuous Dosing:** Add 40-140 ppm of TOLCIDE PS352C (14-49 ppm THPS) based on total water volume or an equivalent based on dry weight of paper produced. The maximum use concentration of THPS in the slurry cannot exceed 84 ppm.

c) For use as a preservative for Alkyl Ketene Dimer (AKD) Emulsions.

This product can be used to prevent bacterial and fungal contamination of AKD emulsions that are applied to food-contact paper and paperboard at the dry end of the paper machine.

**Dosing:** Apply from 500-1420 ppm of Tolidide PS352C (175-497 ppm THPS) to the AKD emulsion to be preserved.

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

**Initial Slug Dose:** Add 200-750 ppm of TOLCIDE PS352C (70-262.5 ppm THPS) based on total water volume. Repeat until control is obtained. Thereafter, add either Intermittently 75-300 ppm of TOLCIDE PS352C (26-105 ppm THPS) or Continuously 40-140 ppm of TOLCIDE PS352C (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 PS352C 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 75-200 ppm of TOLCIDE PS352C (26-70 ppm THPS) 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 0.05% to 0.5% of TOLCIDE PS352C (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 PS352C 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 PS352C 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 PS352C 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 PS352C is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil wells.

#### **Water Floods**

Tolidide PS352C should be added to a water flood system at a point where uniform mixing will occur.

**Initial Treatment:** For a noticeably fouled system, add 200-750 ppm TOLCIDE PS352C (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 30-210 ppm TOLCIDE PS352C (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 PS352C can be dosed continuously at a level of 30-143 ppm (10.5-50 ppm THPS).

#### **Oil and Gas Pipelines**

TOLCIDE PS352C 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 PS352C can be dosed continuously at a level of 30-215 ppm (10.5-75 ppm THPS).

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

TOLCIDE PS352C should be added to these fluids at a point where uniform mixing will occur. Add 70-3000 ppm of TOLCIDE PS352C (24.5-1050 ppm THPS) to a freshly prepared fluid depending on severity of contamination.

TOLCIDE® is a registered trademark of Rhodia Consumer Specialties Limited.

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No.

33677-5

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