

33677-5

10-18-2011

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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

OCT 18 2011

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

Attention: Cristina Griffin

Subject: Tolcide® PS352C
EPA Registration No. 33677-5
Amendment Dated September 22, 2011

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Minor Label Changes

General Comments

Submit two (2) copies of the final printed labels for our review. A stamped copy of the "accepted" label is enclosed for your records.

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 "M. Swindell".

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

Enclosure

TOLCIDE® PS352C

INDUSTRIAL ANTIMICROBIAL

ACTIVE INGREDIENT:

Tetrakis(hydroxymethyl) phosphonium sulfate 35%

OTHER INGREDIENTS:..... 65%

TOTAL: 100%

EPA Reg. No. 33677-5

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. For emergency information call the **National Pesticides Information Center** at 1-800-858-7378, 6:30 AM to 4:30 PM, Pacific time (PT), seven days a week. 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

ACCEPTED
with COMMENTS
EPA Letter Dated:

Manufactured for:



RHODIA UK Limited

Trinity Street - Oldbury

West Midlands - United Kingdom B69 4WD

609-860-4000

Active ingredient produced in the United Kingdom and/or China

OCT 18 2011
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 33677-5

NET CONTENTS: As Marked on Container

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

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Registered under EPA Reg. No. 33671

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MACROFOULING CONTROL [Not for use in California]

TOLCIDE® PS352C 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 57 ppm of TOLCIDE® PS352C (20 ppm THPS) based on total water volume. Continue to add TOLCIDE® PS352C as needed to maintain the 20 ppm active ingredient (THPS) level for a period of at least 96 hours.

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

FIRE PROTECTION SYSTEMS

TOLCIDE® PS352C 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® PS352C 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® PS352C should be added to a fire protection system using a chemical metering pump capable of variable pump rates. The TOLCIDE® PS352C should be injected at a point, such as a riser, manifold or makeup feed water line, where uniform mixing and distribution will occur. Add 215-857 ppm TOLCIDE® PS352C (75-300 ppm THPS) depending on severity of microbial contamination in the system. Repeat as needed.

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 114-750 ppm of TOLCIDE® PS352C (40-262.5 ppm THPS) for 2-6 hours 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.

SERVICE WATER AND AUXILLIARY SYSTEMS

TOLCIDE® PS352C 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 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%-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 AND PETROCHEMICAL 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 [Not for use in California]

TOLCIDE® 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 of 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 14-210 ppm TOLCIDE® PS352C (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 14-143 ppm (5-50 ppm THPS).

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Hydraulic Fracturing [Not for use in California]

TOLCIDE® PS352C 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 143-750 ppm of TOLCIDE® PS352C (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® PS352C 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® PS352C 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® 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.

Gas Storage Well and Systems [Not for use in California]

Individual injection wells should be treated with TOLCIDE® PS352C 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® PS352C to produce a concentration of 71.5-285 ppm TOLCIDE® PS352C (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® PS352C to control bacteria and simultaneously dissolve iron sulfide deposits. The TOLCIDE® PS352C will be pumped into the well as a solution in water containing from 28.5% to 85% TOLCIDE® PS352C (10%-30% 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 143-1430 ppm TOLCIDE® PS352C (50-500 ppm THPS), depending on water quality and length of time the equipment will remain idle.

Pipeline Pigging and Scraping Operation

Add TOLCIDE® PS352C 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® PS352C should be added to produce a concentration of 0.014% to 0.14% (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 the 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.

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[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 $\frac{1}{4}$ 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.

[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.

ACCEPTED

TOLCIDE® is a registered trademark of Rhodia UK Limited

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