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Systems Integration Group, Inc.

PM . 33 33677-6

UNITED TATES ENVIRONMENTAL PROTECTION

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JUN 2 2 1999

Albright & Wilson UK Limited 210-222 Hagley Road West Oldbury, Warley, West Midlands B68 ONN UK

Subject: Tolcide PS355A

EPA Registration No. 33677-6 Notification Per PR-Notice 95-2 Your Notification Dated May 25, 1999

This will acknowledge receipt of your notification to add the phrase "including microorganisms that contribute to biofilm formation in oil field recovery" under the Directions for Use (Oil Field Operations) submitted under the provisions of FIFRA section 3(c)9. Based on a review of the submitted material, the following comments apply.

The application is acceptable and the notification has been made a part of the records for this file.

Sincerely,

Marshall Swindell

Notification Coordinator

Regulatory Management Branch I

Antimicrobials Division (7510C)

SYMBOL		
SURNAME		
DATE		
PA Form 1320-1A (1/90)	Printed on Recycled Paper	OFFICIAL FILE COP

Please read instructions on reverse before compaung	form.	Form Appro	vea, JMB No. :	2070-0060	. Approval expires 2-28-95		
Environmental P	Inited States I Protection Agency Ington, DC 20460		Registration Amendment Other		OPP Identifier Number		
Application for Pesticide - Section I							
1. Company/Product Number 33677-6	l l	2. EPA Product Manager M. Swindell None Re			posed Classification		
4. Company/Product (Name) Tolcide PS355A	I '	M# 3	<u></u>				
5. Name and Address of Applicant (Include ZIP Code) Albright & Wilson UK Limited 210-222 Hagley Road West Oldbury, Warley, West Midlands B68 ONN Check if this is a new address	V UK	o)(i), my product is o: EPA Reg. No	ical in cor	FIFRA Section 3(c)(3) mposition and labeling			
CHACK II THIS IS & HAM SUCIASS		Product Name					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below. Explanation: Use additional page(s) if necessary. IFor section 1 and Section 11.) Notification of inclusion of inadvertently omitted text per PR Notice 98-10 (certification statement attached). Correct editing error in general use information under OIL FIELD OPERATIONS. Following phrase (previously approved by EPA) was inadvertently omitted during a label update. The phrase ", including microorganisms that contribute to biofilm formation in oil field recovery," should follow just after " general aerobic bacteria," in the first paragraph under OIL FIELD OPERATIONS.							
Section - III							
1. Material This Product Will Be Packaged In:					· · · · · · · · · · · · · · · · · · ·		
Yes Yes If "Yes" No. per If		Yes Metal Plastic Glass Ses" No. per age wgt container Other (Sp			pecify)		
ocation of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions							
6. Manner in Which Label is Affixed to Product Lithograph Paper glued Stenciled							
Section - IV							
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)							
Name Paul R. Larson Title Product Stewardship Mana		ewardship Manager	Telephone No. (Include Area Code) er 804-968-6384				
f certify that the statements I have made on this acknowledge that any knowlingly false or mis both under applicable law.	statement may				6. Date Application ; ; ; Aposived ; ; (\$tamped) ; ; ;		
4. Typed Name Paul R. Larson	5. Date	5/25/99					

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.

Paul R. Larson, Product Stewardship Manager, Albright & Wilson

TOLCIDE® PS355A

INDUSTRIAL ANTIMICROBIAL

 ACTIVE INGREDIENT:
 35%

 Tetrakis(hydroxymethyl) phosphonium sulfate.
 65%

 INERT INGREDIENTS:
 60%

 TOTAL:
 100%

EPA Reg. No. 33677-6

EPA Est. 550-TX-2

KEEP OUT OF REACH OF CHILDREN

DANGER

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.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric layage.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

DANGER: 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

ALBRIGHT & WILSON

ALBRIGHT & WILSON UK LIMITED

210-222 Hagley Road West • Oldbury, Warley • West Midlands • United Kingdom B68 0NN

Product of the United Kingdom

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DIRECTIONS FOR USE

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)

Not for use in manufacture of paper and paperboard products and adhesives that may come in contact with food.

<u>Dosing</u>: 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 PS355A based on total water volume or an equivalent based on dry weight of paper produced. Continuous Dosing: Add 40-140 ppm of TOLCIDE PS355A based on total water volume or an equivalent based on dry weight of paper produced.

INDUSTRIAL AND/OR COMMERCIAL RECIRCULATING COOLING WATER SYSTEMS (for control of bacteria, fungi and algae) Initial Slug Dose: Add 200-750 ppm of TOLCIDE PS355A based on total water volume. Repeat until control is obtained. Thereafter, add either intermittently 75-300 ppm of TOLCIDE PS355A or Continuously 40-140 ppm of TOLCIDE PS355A 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 PS355A 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 PS355A 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 PS355A 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 PS355A 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 PS355A 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 PS355A 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 PS355A is also effective for use in controlling microbial growth in fluids used for drilling and stimulation of oil wells.

Water Floods

Tolcide PS355A 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 PS355A. When added to a flowing system, slug dose for 2-6 hours based on flow rates. Repeat as necessary until control is achieved.

<u>Subsequent Treatment</u>: Once control has been achieved, add 30-210 ppm TOLCIDE PS355A 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 PS355A can be dosed continuously at a level of 30-143 ppm.

Oil and Gas Pipelines

TOLCIDE PS355A 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 PS355A can be dosed continuously at a level of 30-215 ppm.

Drilling Muds, Packer Fluids, Completion and Workover Fluids

TOLCIDE PS355A should be added to these fluids at a point where uniform mixing will occur. Add 70-3000 ppm of TOLCIDE PS355A to a freshly prepared fluid depending on severity of contamination.

TOLCIDE® is a registered trademark of Albright & Wilson UK Limited.

NET CONTENTS: As Marked on Container

30F-0599

