

87262-4

3/14/2014

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



United States
Environmental Protection
Agency

Office of Pesticide Programs

Compass Chemical International, LLC
5544 Oakdale Road
Symrna, GA
30082

MAR 14 2014

Attention: Robert Rosenwasser

Subject: COMPASS THPS
EPA Registration No: 87262-4
Notification Dated: January 24, 2014

This will acknowledge receipt of your notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46

Proposed Notification:

- Label Changes Required by the state of California

Based on a review of the submitted material, the following comments apply: The notification dated January 24, 2014 to add "**Service Water and Auxiliary Systems**" "**Heat Transfer Systems**" and "**Industrial and/or Commercial Recirculating Cooling Water Systems**" and "**Coatings, Pigments and Filler Slurries**" sections. To add "**Not For Use In California**". This information has been added to your file.

If you have any questions concerning this letter please contact Zebora Johnson at (703) 308- 7080

Sincerely

A handwritten signature in black ink that reads "Marshall Swindell".

Marshall Swindell
Product Manger (33)
Regulatory Management Branch I
Antimicrobial's Division (7501P)

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{All text in brackets [xxx] is optional and may or may not be intended on a final label.}
{All text in braces {xxx} is administrative and will not appear on a final label.}

COMPASS THPS

ACTIVE INGREDIENT:

Tetrakis(hydroxymethyl) phosphonium sulfate.....76%

OTHER INGREDIENTS:..... 24%

TOTAL:100%

EPA Reg. No. 87262-4

EPA Est. No. 008576-GA-001

NOTIFICATION
Date Reviewed: 3/17/14
Reviewed By: [Signature]

KEEP OUT OF REACH OF CHILDREN

DANGER

FIRST AID

If in Eyes:

- 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 on Skin or Clothing:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center for further treatment advice.

If inhaled:

- 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 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 do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

HOT LINE NUMBER

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 time (PT), seven days a week. In case of a spill emergency, call Chemtrec at 1-800-424-9300.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage. Maintain adequate ventilation and oxygenation of the patient. No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

Manufactured for:
Compass Chemical International, LLC
5544 Oakdale Road
Symrna, GA 30082

NET CONTENTS: _____ GAL (LBS)

LOT# _____

PRECAUTIONARY STATEMENTS**HAZARD TO HUMANS AND DOMESTIC ANIMALS**

DANGER: Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Harmful if inhaled. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray. Wear long-sleeved shirt and pants or coveralls, goggles or face shield and chemical-resistant gloves when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

USER SAFETY RECOMMENDATIONS

Users must wash hands before eating, drinking, chewing gum or using the toilet. Users must remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users must remove PPE immediately after handling this product. Wash outside of gloves before removing. As soon as possible, wash thoroughly. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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. Not for use in paint.

OIL FIELD AND PETROCHEMICAL OPERATIONS

COMPASS THPS 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. COMPASS THPS 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. COMPASS THPS 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)

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

Initial Treatment: For a noticeably fouled system, add 93-350 ppm COMPASS 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 14-98 ppm COMPASS 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: COMPASS THPS can be dosed continuously at a level of 14-67 ppm.

Hydraulic Fracturing (Not for use in California)

COMPASS THPS 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 66-350 ppm of COMPASS THPS, depending on the degree of bacterial fouling in the source water.

Oil and Gas Production and Transmission Pipelines and Systems

COMPASS THPS should be added at a point in the pipeline where uniform mixing will occur. The application should be conducted to ensure maximum distribution of COMPASS THPS 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. MED Slug Dosing: Follow instructions for waterflood treatment.

Continuous Dosing: COMPASS THPS can be dosed continuously at a level of 14-100 ppm.

Drilling Muds, Packer Fluids, Completion and Workover Fluids

COMPASS THPS should be added to these fluids at a point where uniform mixing will occur. Add 33-1400 ppm of COMPASS 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 COMPASS THPS 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 COMPASS THPS to produce a concentration of 33.3-133.3 ppm COMPASS 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 COMPASS THPS to control bacteria and simultaneously dissolve iron sulfide deposits. The COMPASS THPS will be pumped into the well as a solution in water containing from 13.33 to 40% COMPASS THPS (10%-20% 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 66.6-666.5 ppm COMPASS THPS, depending on water quality and length of time the equipment will remain idle.

Pipeline Pigging and Scraping Operation

Add COMPASS THPS 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 COMPASS THPS should be added to produce a concentration of 70-700 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.

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 93-350 ppm of COMPASS THPS for 2-6 hours based on total water volume. Repeat until control is obtained. Thereafter, add either intermittently 35-140 ppm of COMPASS THPS (26-105 ppm THPS) or continuously 18.6-65.3 ppm of COMPASS THPS per day. Dirty systems must be cleaned prior to treatment.

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INDUSTRIAL FRESH WATER SYSTEMS (Not for use in California)

Do not use in freshwater used in the manufacture of paper and paperboard products that may contact food.

COMPASS THPS is effective in controlling algae in holding ponds and in controlling bacteria and fungi in holding and processing tanks of industrial fresh water systems supplying water to pulp and paper mills, textile mills, and other manufacturing plants. In pulp and paper mills, treatment of the fresh water with COMPASS THPS can make an important contribution to slime control. The use of COMPASS THPS as described will reduce the development of slime in fresh water pipes other equipment, and on the pulp and paper mill machine parts contacted by fresh water. If water is used in the manufacture of paper and paperboard products that may contact food, the concentration of THPS in the slurry may not exceed 84 ppm.

For the control of algae in industrial fresh water systems, COMPASS THPS should be added to provide a concentration of 1.33-13.33 ppm of product. Treatment should be based on the amount of water entering a pond or reservoir or leaving the pond or reservoir and entering the immediate processing operations. While treatment can be made continuously, regular slug-dosing treatment will provide adequate control.

INDUSTRIAL WASTEWATER SYSTEMS (Wastewater Systems, Wastewater Sludge and Wastewater Holding Tanks) (Not for use in California)

COMPASS THPS should be added to a wastewater system or sludge at a convenient point of uniform mixing such as a digester.

Add 333.33-1666.66 ppm of COMPASS THPS to wastewater or sludge.

MACROFOULING CONTROL (Not for use in California)

COMPASS THPS 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 26.66 ppm of COMPASS THPS based on total water volume. Continue to add COMPASS THPS as needed to maintain the 20 ppm active ingredient (THPS) level for a period of at least 96 hours.

SERVICE WATER AND AUXILIARY SYSTEMS (Not for use in California)

COMPASS THPS 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.

HEAT TRANSFER SYSTEMS (Evaporative Condensers, Dairy Sweetwater Systems, Hydrostatic Sterilizers and Retorts, Brewery and Other Pasteurizers, and Warmers)

Add COMPASS THPS 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 35-93.3 ppm of COMPASS THPS at a point where uniform mixing and even distribution will occur. Repeat as needed to maintain control.

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PAPER AND PAPERBOARD MANUFACTURING (for control of bacteria, fungi and algae)

a) For use as a slimicide 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 32.7-1333.3 ppm of COMPASS THPS based on total water volume or an equivalent based on dry weight of paper produced.

Continuous Dosing: Add 53.3-186.7 ppm of COMPASS THPS based on total water volume or an equivalent based on dry weight of paper produced.

b) For use as a preservative to retard microbial growth in water-based coatings, starches, pigments and filler slurries.

Do not use in paper and paperboard and adhesives that will contact food. (Not for use in California)

The treatment rate necessary to retard spoilage of the additive will vary with the extent of contamination of make-up water and the length of storage.

Dosing: Apply from 250-714 ppm of COMPASS THPS to the additive to be preserved based on the total weight of the additive and water]

COATINGS, PIGMENTS AND FILLER SLURRIES (Not for use in California)

Note: Do not use in paper and paperboard and adhesives that will contact food.

For use as a preservative to retard microbial growth in water-based coatings, starches, pigments and filler slurries. The treatment rate necessary to retard spoilage of the additive will vary with the extent of contamination of make-up water and the length of storage.

Dosing: Apply from 233.33-666.5 ppm of COMPASS THPS to the additive to be preserved based on the total weight of the additive and water.

EMULSION AND SOLUTION PRESERVATION

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 0.0233 to 0.233% of COMPASS THPS. 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 COMPASS THPS to be added for the preservation of given formulations will depend on the components as well as local storage time and requirements

FIRE PROTECTION SYSTEMS

COMPASS THPS 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. COMPASS THPS also helps to remove free oxygen from the water, thus eliminating an important nutrient for bacteria and an important reactant in many corrosion reactions.

COMPASS THPS should be added to a fire protection system using a chemical metering pump capable of variable pump rates. The COMPASS THPS should be injected at a point, such as a riser, manifold or makeup feed water line, where uniform mixing and distribution will occur. Add 100-400 ppm COMPASS THPS depending on severity of microbial contamination in the system. Repeat as needed.

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

