

April 16, 2003

Vivienne Gaudette
Staff Product & Regulatory Information Specialist
Drew Industrial Division
Ashland Chemical Company
Division of Ashland, Inc.
One Drew Plaza
Boonton, NJ 07005

Subject: DREW 3025
EPA Registration No. 1757-108
Application Date: March 13, 2003
Receipt Date: March 18, 2003

Dear Ms. Gaudette:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c)9.

Proposed Notification

- Removal of Establishment Numbers

General Comments

Based on a review of the material submitted, the following comments apply:

The notification application is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6345.

Sincerely,

Wanda Mitchell
Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510C)

CONCURRENCES

SYMBOL	7510C	7510C						
SURNAME	L. Berg	Mitchell						
DATE	4/16/03	4/16/03						



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United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1757-108	2. EPA Product Manager Wanda Mitchell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) DREW 3025	PM# 32	
5. Name and Address of Applicant (Include ZIP Code) Drew Industrial Division, Ashland Chemical Company, Division of Ashland Inc. One Drew Plaza, Boonton, NJ 07005 <input type="checkbox"/> Check if this is a new address	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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

- To notify the Agency of the removal of establishment numbers 18533-KS-2 and 2342-MS-1

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If "Yes" Unit Packaging wgt. No. per container		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Package wgt	No. per container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container bulk or part drum: 5, 30 & 55 gal drums; portable tank		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" 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 Vivienne Gaudette	Title Staff Product & Regulatory Info. Specialist	Telephone No. (Include Area Code) 973-263-7636
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 knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Staff Product & Regulatory Information Specialist	
4. Typed Name Vivienne Gaudette	5. Date March 13, 2003	

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Ashland Specialty Chemical Company
Division of Ashland Inc.



Drew Industrial Division

Address Reply:
One Drew Plaza
Boonton, NJ 07005
Tel: (973) 263-7600
Fax: (973) 263-4483

March 13, 2003

Document Processing Desk (AMEND)
Office of Pesticides Programs (7504C)
U. S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue NW
Washington, D.C. 20460-001

Attention: Wanda Mitchell
Project Manager (32)
Antimicrobial Program Branch
Registration Division (7505C)

RE: DREW 3025
Notification of Removal of Establishment Numbers 18533-KS-2 and 2342-MS-1

Dear Ms. Mitchell,

As directed in your telephone call with Vivienne Gaudette today, enclosed are five (5) full sized labels for the above referenced product.

Additional, I am submitting EPA Form 8570-1 for Notification of Removal of Establishment Numbers as referenced above.

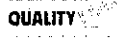
I understand that it is a violation of 18 U.S. C. Sec. 1001 to willfully make any false statement of EPA. I further understate that if this amendment is not consistent with the terms of PR Notice 01-1 and 40 CFR 156.10, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Enclosed are the following:
Application for Pesticide Notification
Five full sized copies of labeling.

Very truly yours,

Carole Koch
Compliance Assistant A

\ck
Enclosures



Ashland's Commitment to
Quality and Productivity

Headquarters:
5200 Blazer Parkway
Dublin, Ohio 43017

Tel: (614) 790-3333
Fax: (614) 790-4119
<http://www.ashspec.com>



A Responsible Care
Company

DREWTM 3025

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Highly corrosive. Causes irreversible eye damage. Use of contact lens is not recommended when handling this product. Do not get in eyes, on skin, on clothing. Wear eyewear (goggles or face shield). Wear protective eyewear (goggles or face shield), rubber gloves and protective clothing when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Do not breathe vapor or spray mist.

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. Do not contaminate water by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on this label.

CHEMICAL HAZARDS

DANGER: DRY DREW 3025 IS A STRONG OXIDIZING AGENT. Mix only into water. Contamination may start a chemical reaction with generation of heat and possible fire and explosion. Do not contaminate with garbage, dirt, organic matter, household products, chemicals, soap products, paint products, solvents, acids, vinegar, beverages, oils, pine oil, dirty rags or any other foreign matter.

EMERGENCY HANDLING

In case of contamination or decomposition, do not reseal container. If possible, isolate container in open and well ventilated area. Flood with large columns of water. If fire occurs, extinguish fire by applying large volumes of water. Any unopened drums near the fire should be cooled by spraying with water.

IMPORTANT NOTICE: SELLER WARRANTS THAT THE PRODUCT CONFORMS TO ITS CHEMICAL DESCRIPTION AND IS REASONABLY FIT FOR THE PURPOSE STATED ON THE LABEL UNDER NORMAL CONDITIONS OF USE. THE FOREGOING WARRANTIES ARE EXCLUSIVE AND ARE IN LIEU OF ALL OTHER WARRANTIES, WHETHER WRITTEN, ORAL OR IMPLIED. THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, IN OTHER RESPECTS THAN AS EXPRESSLY SET FORTH HEREIN, ARE EXPRESSLY EXCLUDED AND DISCLAIMED.

NOTE: BUYER ASSUMES ALL RESPONSIBILITY FOR SAFETY AND USE NOT IN ACCORDANCE WITH DIRECTIONS.

GAL. NET CONTENTS: _____

BATCH NO.: _____

PRI D-3025 FA 2-07-03

FOR USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A DISINFECTANT, SANITIZER, OR FOR MICROORGANISM CONTROL

ACTIVE INGREDIENTS: SODIUM CHLORATE25.0%
INERT INGREDIENTS:75.0%
TOTAL100.0%

Contains 2 pounds Sodium Chlorate per gallon at 70°F.

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 or doctor for 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.
- 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 or doctor for further treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Have the product container or label and MSDS with you when calling a poison control center or doctor, or going for treatment.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 1757-108

EPA Est. No. 1757-NJ-01
1757-TX-01

Sold by:



Drew Industrial Division



Ashland Chemical Company
Division of Ashland Inc.

One Drew Plaza, Boonton, New Jersey 07005

Phone (973) 263-7600

24 Hour Emergency Telephone Number

1-800-274-5263 or 1-800-ASHLAND

TM Trademark and [®] Registered trademark of Ashland Inc.

¹ KYNAR is a registered trademark of Pennwalt Corp.

² TEFLON is a registered trademark of E.I. DuPont de Nemours & Co.

FOR INDUSTRIAL USE ONLY

DREW 3025 Precursor is a stabilized, non- designed for use with the patented GENEROX. Chlorine dioxide has numerous industrial appli Chlorine dioxide is stable and highly active o nitrogen compounds, eliminates taste and odo will cause a minimum of corrosion of system l When DREW 3024 Precursor is mixed with l reacts rapidly to form chlorine dioxide and chl

DIRECTION

IT IS A VIOLATION OF FEDER IN A MANNER INCONSIS

DOSAGE: The GENEROX unit provide prec the aqueous chlorine solution under controlle chlorine dioxide solutions. The exact dosage nature and requirements of the specific appli further details about dosages for your particu
FEEDING: The GENEROX unit is constructe Precursor should be fed from the shipping c polyethylene construction. Equipment constru may be used for handling DREW 3025 Precur Feed strength solutions of chlorine dioxide sho

FEED REQ

Feed rates of DREW 3025 will depend on the s desired. The exact dosage will depend on the effective control. Approximately one pound of DREW 3025.

METHOD

Large amounts of chlorine dioxide can be gener including methanol, sodium chloride, hydrogen for use in the manufacture of paper and paperbe Consult instructions on the chlorine dioxide ge

STORAGE A

DO NOT CONTAMINATE WATER, FOOD

PESTICIDE DISPOSAL: Pesticide wastes container when not in use. Do not crop, roj or Store in a cool, dry, well-ventilated area awa container.

CONTAINER DISPOSAL: Do not reuse emp offer for recycling or reconditioning, or pur incineration, or if allowed by state and local smoke. Pesticide wastes are toxic. Improper or rinsate is a violation of Federal law. if t according to label instructions contact you Agency, or the Hazardous Waste represen guidance.

BEFORE HANDLING OR USING, RE MATERIAL SAFETY DATA S

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**SODIUM CHLORATE,
AQUEOUS SOLUTION
UN 2428**