

December 24, 2003

Carole Koch  
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: September 9, 2003  
Receipt Date: October 6, 2003

Dear Ms. Koch:

The following amendment submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the conditions listed below:

- Revised label per PR Notice 2001-1

**Conditions**

1. The product descriptor should be revised to read "FOR USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A DISINFECTANT, SANITIZER, OR FOR MICROORGANISM CONTROL (ONLY INTENDED FOR THOSE USE SITES INDICATED UNDER THE METHOD OF APPLICATION)."
2. Revise the Ingredient statement as follows:
 

Active Ingredient: Sodium Chlorate	25.0%
Other Ingredients	<u>75.0%</u>
Total	100.0%
3. The first sentence of the Environmental Hazards statement should be revise to read "This product is toxic to fish and aquatic organisms."

CONCURRENCES

SYMBOL	1757-108							
SURNAME	M. J. ...							
DATE	12-24-03							

**General Comments**

*A stamped copy of the labeling accepted with conditions is enclosed. Submit a copy of your final printed labeling before distributing or selling the product bearing the revised labeling.*

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

*Sincerely,*



*Robert S. Brennis  
Product Manager - Team 32  
Regulatory Management Branch II  
Antimicrobials Division (7510C)*

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

DEC 24 2003

317

# DREW

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended for the pesticide,  
registered under EPA Reg. No. 1757-108

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

ACTIVE INGREDIENTS: SODIUM CHLORATE ..... 25.0%  
INERT INGREDIENTS: ..... 75.0%  
TOTAL ..... 100.0%

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  
2342-MS-1

Sold by:



Drew  
Industrial Division

**Ashland Chemical**

Ashland Chemical Company  
Division of Ashland Inc.

One Drew Plaza, Boonton, New Jersey 07005  
Phone (973) 263-7600  
24 Hour Emergency Telephone Number  
1-800-274-5283 or 1-800-ASHLAND  
™ Trademark and ® Registered trademark  
of Ashland Inc.

<sup>1</sup> KYNAR is a registered trademark of Penwalt Corp.  
<sup>2</sup> TEFLON is a registered trademark of E.I. DuPont de Nemours & Co.

FOR INDUSTRIAL USE ONLY

TM

# 3025

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

417

DEC 24 2003

Under the Federal Insecticide,  
Fungicide and Rodenticide Act,  
amended for the pesticide  
registered under EPA Reg. No. 1757-108

DREW 3025 Precursor is a stabilized, non-volatile, sodium chlorate formulation specifically designed for use with the patented GENEROX™ unit for on-site generation of chlorine dioxide. Chlorine dioxide has numerous industrial applications as a disinfectant and as a chemical oxidant. Chlorine dioxide is stable and highly active over a wide pH range, will not react with ammonia nitrogen compounds, eliminates taste and odor-causing by-products such as chlorophenols, and will cause a minimum of corrosion of system metals at use dosages. When DREW 3024 Precursor is mixed with DREW 6006 acid under controlled conditions, it reacts rapidly to form chlorine dioxide and chlorine.

## DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT  
IN A MANNER INCONSISTENT WITH ITS LABELING.

**DOSAGE:** The GENEROX unit provide precise metering of the chlorine dioxide precursor and the aqueous chlorine solution under controlled conditions for safe and efficient generation of chlorine dioxide solutions. The exact dosage of DREW 3025 Precursor will depend upon the nature and requirements of the specific application. Your Ashland representative will provide further details about dosages for your particular system.

**FEEDING:** The GENEROX unit is constructed entirely of compatible materials. DREW 3025 Precursor should be fed from the shipping container or a bulk storage tank of fiberglass or polyethylene construction. Equipment constructed of KYNA<sup>1</sup>, TEFLON<sup>2</sup>, PVC or polyethylene may be used for handling DREW 3025 Precursor.

Feed strength solutions of chlorine dioxide should be fed only through rigid PVC piping.

## FEED REQUIREMENTS

Feed rates of DREW 3025 will depend on the severity of contamination and the degree of control desired. The exact dosage will depend on the size of the system and residual necessary for effective control. Approximately one pound of chlorine dioxide is generated from 5.7 pounds of DREW 3025.

## METHOD OF FEED

Large amounts of chlorine dioxide can be generated from DREW 3025 with many reducing agents including methanol, sodium chloride, hydrogen peroxide, sulfur dioxide and electro-chemical. Not for use in the manufacture of paper and paperboard products that will come in contact with food. Consult instructions on the chlorine dioxide generation system before using DREW 3025.

## STORAGE AND DISPOSAL

**DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL.**

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Keep product dry in tightly closed container when not in use. Don't drop, roll or skid drum. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame. Do not reuse empty container.

**CONTAINER DISPOSAL:** Do not reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes can not 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.

DEC 24 2003

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this amendment to the label for this product is registered under EPA Reg. No. 1757-108

## METHOD OF APPLICATION

Chlorine dioxide generation must take place only under controlled conditions within a chlorine dioxide generator. The generator reacts DREW 3025 with a 78% sulfuric acid to produce an aqueous solution of chlorine dioxide. This solution is then added at a point in the system to be treated. Production rate of chlorine dioxide is based on the specific application, severity of contamination, desired control and residual necessary for effective control. Chlorine dioxide should always be introduced to the system below the water at a point of adequate mixing and distribution.

**RECIRCULATING AND NON-RECIRCULATING AND ONCE THROUGH COOLING WATER SYSTEMS.** For control of microbiological and algae contamination in cooling water systems. An intermittent or a continuous application may be used. For continuous application, a residual chlorine dioxide concentration between 0.10 to 1.00 ppm is desired. If using intermittent application, a residual of chlorine dioxide concentration between 0.10 to 5.00 ppm during feed cycle is desired. Chlorine dioxide should be added to water well, process water loop and cooling tower basin. For the control of mollusks, a continuous or intermittent application may be used. To remove adult mollusks on an intermittent basis, a chlorine dioxide residual of 0.10 to 0.50 ppm is desired. For continuous application, a chlorine dioxide residual of 0.10 to 0.25 ppm is desired. To prevent the settlement of mollusk veligers in cooling water systems, a chlorine dioxide residual of 0.10 to 0.50 ppm is desired.

**GENERAL INDUSTRIAL PROCESS WATER TREATMENT (WHITE WATER PAPER MILL SYSTEMS, FRESH WATER DISINFECTION IN PAPER MILLS).** For control of microbial contamination in papermaking and general industrial water systems. An intermittent or a continuous application may be used. For continuous application, a residual chlorine dioxide concentration between 0.10 to 5.00 ppm is desired. If using intermittent application, a residual of chlorine dioxide concentration should be maintained between 0.10 to 5.00 ppm during feed cycle.

**WASTEWATER DISINFECTION.** Municipal and industrial sewage and wastewater disinfection can generally be achieved with a chlorine dioxide residual of 0.50 to 5.00 ppm.

**BEFORE HANDLING OR USING, READ AND UNDERSTAND CURRENT MATERIAL SAFETY DATA SHEET FOR THIS PRODUCT.**

**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.

ACCEPTED  
with COMMENTS  
EPA Letter Dated:

617

DEC 24 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1757-108



**SODIUM CHLORATE,  
AQUEOUS SOLUTION  
UN 2428**

717

DEC 24 2003

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act as  
amended, for the pesticide,  
registered under EPA Reg. No. 1757-108

**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.

**GAL. NET CONTENTS:** \_\_\_\_\_

**BATCH NO.:** \_\_\_\_\_