

1757-109
7/16/2009
10/4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

JUL 16 2009

Kathryn Ingram
Drew Industrial Division
Ashland Chemical Company, Division of Ashland Inc.
One Drew Plaza
Boonton, NJ 07005

FILE COPY

Subject: **Drewbrom Precursor**
EPA Registration Number: 1757-109
Application Dated: July 1, 2009
Receipt Dated: July 6, 2009

Dear Ms. Ingram:

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

Proposed Notification:

- Updated Storage and Disposal per PR Notice 2007-4

General Comment:

Based on a review of the material submitted, the following comment applies:

This notification is accepted and a copy has been inserted in your file for future reference.

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

Sincerely,

Wanda Henson
Product Reviewer (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

2014

Please read instructions on reverse before completing

Form Approved. OMB 1070-0060

Print Form



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 1757-109	2. EPA Product Manager Emily Mitchell / #32	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Drebrom Precursor	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.)

Notification of a label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. See attached letter for additional statements.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions
 On Label
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph
 Paper glued
 Stenciled Other _____

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Kathryn Ingram	Title Regulatory Specialist	Telephone No. (Include Area Code) 904/256-0311
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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.

2. Signature <i>Kathryn Ingram</i>	3. Title Regulatory Specialist	6. Date Application Received (Stamped)
4. Typed Name Kathryn Ingram	5. Date July 1, 2009	

Name Kathryn Ingram
Title Regulatory Specialist

7910 Baymeadows Way Jacksonville, FL 32256

KRIgram@Ashland.com

July 1, 2009

Document Processing Desk (NOTIF)
Office of Pesticides Programs (7504P)
Antimicrobials Division
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject: Drewbrom Precursor; EPA Registration # 1757-109
Notification per PR Notice 2007-4

Dear Ms. Mitchell:

This submission is to notify the EPA of a label change to the Storage & Disposal section of the Drewbrom Precursor label per PR Notice 2007-4.

This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, 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 form, EPA Form 8570-1
- Revised product label with changes clearly marked

Please send all correspondence to the following address:

Ashland Inc
7910 Baymeadows Way
Jacksonville, FL 32256
Attn: Kathryn Ingram

Please contact me at 904-256-0311 or via email at KRIgram@Ashland.com with questions or comments regarding this submission. Thank you for your assistance.

Thank you,

Kathryn Ingram
Kathryn Ingram

DREWBROM® PRECURSOR

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if absorbed through skin. Avoid contact with skin and clothing. Wash with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not get into eyes.

ENVIRONMENTAL HAZARDS

This chemical is toxic to fish and aquatic organisms. 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.

PHYSICAL AND CHEMICAL HAZARDS

DREWBROM PRECURSOR is not flammable. Avoid contact with strong oxidizers (other than sodium hypochlorite and chlorine), acids, alkaloidal and heavy metal salts.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in well ventilated, dry area. Product should be stored at 50° F or above.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Offer for reconditioning, if appropriate. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons.

DREWBROM PRECURSOR is used as a disinfectant, bactericide, fungicide, algicide, slimeicide, and molluscicide in recirculating and once-through cooling water systems, brewery pasteurizing systems, waste water systems, and pulp and paper mills. It is to be used in conjunction with an oxidant such as sodium hypochlorite (12.5%) or chlorine gas (99.9%) to produce the hypobromous acid. DREWBROM PRECURSOR may be added at system inlet water or metered into the existing NaOCl piping to form a solution of sodium hypobromite. Consult your feeder manufacturer for correct procedure and proper use of the feeder equipment.

WASTEWATER. When used as directed, DREWBROM PRECURSOR effectively disinfects wastewater effluent. The quantity of DREWBROM PRECURSOR required varies with the degree of fouling. Add sufficient DREWBROM PRECURSOR and chlorine or sodium hypochlorite to achieve residual bromine levels of 0.3 ppm to 1 ppm when measured approximately 5 minutes after treatment.

(DIRECTIONS FOR USE CONTINUED)

PRI DB 6/09

FOR USE AS A DISINFECTANT, BACTERICIDE, FUNGICIDE, ALGICIDE, SLIMEICIDE AND MOLLUSCICIDE IN WATER TREATMENT

ACTIVE INGREDIENT	
Sodium Bromide	40.0%
INERT INGREDIENTS	60.0%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

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 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 by mouth-to-mouth, if possible. Call a poison control center or doctor for further 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 further treatment advice.

IF SWALLOWED: Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person. Call a poison control center or doctor for further treatment.

Have the product container or label with you when calling a poison center or doctor, or going for treatment. You may also contact 1 (800) 873-1138 for emergency medical treatment information.

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

FOR INDUSTRIAL USE ONLY NET CONTENTS MARKET ON DRUM

EPA Reg. No.: 1757-109

EPA Est. No.: 1757-NJ-01
1757-TX-01
74655-GA-001

Sold by:



ASHLAND

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
® Registered trademark, Ashland

(DIRECTIONS FOR USE CONTINUED)

Depending on the construction of the wastewater system, DREWBROM PRECURSOR can be effectively added to one or more different locations in the system. Frequently, the compound is added to wastewater receiving secondary treatment at a contact tank preceding the effluent discharge or at the influent of the final clarifier.

The disinfection of sewage effluent must be evaluated by determining that the total number of coliform bacteria and/or fecal coliform bacteria, as determined by the MPN Procedure, of the disinfected effluent has been reduced to or below the maximum permitted by the controlling regulatory jurisdiction.

RECIRCULATING COOLING WATER SYSTEMS INCLUDING BREWERY PASTEURIZERS AND AIR WASHERS. When used as directed, DREWBROM PRECURSOR effectively controls bacteria, fungi, algae, slimes and the growth and settlement of mollusks such as zebra mussel (*Dreissena*) or the Asiatic clam (*Corbicula*) in commercial and industrial cooling towers, heat exchange water towers, industrial water scrubbing systems (not registered in California) and influent systems such as flow through filters, and lagoons, (not registered in California) etc.

INDUSTRIAL ONCE-THROUGH COOLING WATER SYSTEMS. When used as directed, DREWBROM PRECURSOR effectively controls bacteria, fungi, algae, slimes and the growth and settlement of mollusks such as zebra mussel (*Dreissena*) or the Asiatic clam (*Corbicula*) in once-through and closed-cycle fresh and sea water cooling systems. Apply DREWBROM PRECURSOR and chlorine or sodium hypochlorite to the system inlet water or before any other contaminated area in the system.

DOSAGE RATES: Initial Dose: When the system is noticeably fouled, apply sufficient DREWBROM PRECURSOR and chlorine or sodium hypochlorite to achieve a residual bromine level of 0.5-1 ppm or as needed to maintain control. A 0.5 to 2.0 mole ratio of sodium bromide to oxidant is recommended. Typically, the recommended mole ratio may be achieved by using 1.5-6.0 lbs of chlorine gas (99.9%) or 1.3-5.2 gallons NaOCl (12.5%) for each gallon of DREWBROM PRECURSOR.

Subsequent Dose: When microbial control is evident, apply sufficient DREWBROM PRECURSOR and chlorine or sodium hypochlorite to achieve a residual bromine level of 0.5-1 ppm or as needed to maintain control. A 0.5 to 2.0 mole ratio of sodium bromide to oxidant is recommended. Typically, the recommended mole ratio may be achieved by using 1.5-6.0 lbs of chlorine gas (99.9%) or 1.3-5.2 gallons NaOCl (12.5%) for each gallon of DREWBROM PRECURSOR.

The product may be added to the system either continuously or intermittently or as needed to obtain the above residual level. The frequency of feeding and dosage rate will depend on the severity of the problem. It is recommended that the product be used in a manner such that the effluent discharges meet the NPDES guidelines.

IMPORTANT NOTICE: Seller warrants that the product conforms to its chemical description and is reasonable fit for the purposes 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.

NET WEIGHT MARKED ON DRUM

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