

68464-1

01-25-2005

1/12

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 68464-1	2. EPA Product Manager Mr. Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) RootX	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) General Chemical Co. 1745 Salem Industrial Drive P.O. Box 7626 <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.

NOTIFICATION
JAN 25 2005

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

Notification to add "optional front and/or back panel marketing claim as well as a State of Florida specific septic-use restriction". 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. No Registration Service Fee is required for this Notification.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* 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 <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions	
6. Manner in Which Label is Affixed to Product <input 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 Michael A. Jackson	Title Agent for General Chemical Co.	Telephone No. (Include Area Code) 972-939-8390
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 Agent for General Chemical Co.	
4. Typed Name Michael A. Jackson	5. Date 1/10/2005	

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NOTIFICATION

[FRONT LABEL PANEL]

JAN 25 2005

ROOTX

*Kills Roots in Sanitary and Storm Sewers
Self Foams on Contact With Water
Inhibits New Root Growth
Does Not Contain Copper*

Active Ingredient:

Dichlobenil: (2,6 dichlorobenzonitrile)..... 0.55%

Inert Ingredients: 99.45%

Total 100.00%

Keep Out of Reach of Children

CAUTION

See Side (Back) Panel For Additional Precautionary Statements

EPA Reg. No. 68464-1
EPA Est. No. 68464-OR-001

Mfg. for: General Chemical Co.
P.O. Box 7626 Salem OR 97303
1.800.844.4974

ROOTX contains Dichlobenil which kills the roots and prevents new growth. Dichlobenil is readily absorbed on organic and inorganic colloids of sludge and clay in pipe joints providing residual control of root regrowth by inhibiting the development of actively dividing meristem cells in root tips. New root growths formed outside the pipe joints are retarded or inhibited in growth when they come in contact with Dichlobenil inside the pipe. ROOTX self foams on contact with water. The foam acts as a carrying agent, putting the active ingredient in contact with the tree roots above the flow.

NET WEIGHT _____ LBS

[SIDE/BACK PANEL]

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND ANIMALS**

CAUTION

Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
If in eyes	<ul style="list-style-type: none"> • 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 inhaled	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsions may be needed.	

For emergency assistance, please call toll free 800/ 858-7378 .

Personal Protective Equipment: Workers entering sewer pipe must be OSHA certified for confined space entry and use respirators and fresh air blowers. Completely clear hose lines of product with water before extracting. Handlers and Applicators must wear chemical resistant gloves made of waterproof materials such as butyl rubber 14 mils,

[SIDE/BACK PANEL]

natural rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, or nitrile rubber ≥ 14 mils. Handlers and Applicators must wear a NIOSH approved particulate filtering respirator with the approval number (84A-XXX). It is recommended that you require handlers and applicators be fit tested and be trained in the use, maintain, and inspection of the respirator.

Applicators and other handlers must wear long-sleeved shirt and long pants, shoes plus socks.

Follow manufacturer’s instructions for cleaning/maintaining PPE. If there are no such instructions for washable PPE, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards: For terrestrial uses, do not use near a well or where drinking water is stored. Do not apply directly to water or to areas where surface water is present or to inter tidal areas below the mean high water mark. Do not contaminate water when disposing of equipment, wash water or rinsate.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination.

Directions For Use

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read the following directions for use thoroughly before application.

Do not apply this product in a way that will contact workers, other persons or pets either directly or through drift. Only protected handlers may be in the area during application. Keep people and pets out of area during application.

When used in inhabited buildings (residences, offices, hospitals, etc.) windows must be open or an exhaust fan must be operating during the application.

NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA

Recommended Method for Sewer Lines that have Root Problems: Residential 4" sewer lines: [Optional Statements: For product packaged in a jar or bottle the following directions will be used] -Add entire contents of a 1 lb bottle to toilet bowl. Flush immediately to avoid foam overflowing bowl. Flush a second time to push foam completely into sewer line, and a third time if you have a 1.6 gallon low flow toilet.

[SIDE/BACK PANEL]

Restrict water usage from four to six hours. Do not apply through sink or tub.

[Optional Statements: For product package in a sealed plastic bag the following directions will be used] - Remove the 1 lb. sealed plastic bag from the outer container **[Optional: jar or box]**. remove the plastic tie in the middle of the bag which separate the two dry components, the white chemical A and the brown chemical B. Be careful not to puncture or tear the bag during this process. After you have removed the plastic tie, grab each end of the bag and begin to mix the chemicals, by shaking the bag vigorously from the side to side. A proper mixture has been achieved when both chemicals A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes. Carefully cut open one end of the bag. Slowly add the entire contents of the bag to the toilet bowl. Flush immediately to avoid foam overflowing bowl. Flush a second time to push foam completely into sewer line, and a third time if you have a 1.6 gallon low flow toilet. Restrict water usage from four to six hours. Do not apply through sink or tub.

DO NOT USE THESE METHODS IN CALIFORNIA

Follow mixing directions immediately above for jar or sealed plastic bag containers.

Along Sidewalks and Driveways: To inhibit the entry of roots beneath pavement structures and the resulting damage caused by root growth, cut a 3" or deeper edging along the structure and pour 2 oz. per foot of ROOTX into it in a thin strip. Then cover the edged area with soil. Immediately following application, thoroughly water-in ROOTX. Repeat annually to prevent root growth near the surface along sidewalks and driveways.

In Between Tree Roots and Sewer Lines: To prevent long term root growth from the tree to sewer lines, a series of small holes, 2 feet apart, may be bored into the ground near the offending tree or outside the sewer joints using water or mechanical boring equipment. Add 4 oz. of ROOTX per hole and fill with soil. Be sure that the holes location and depth is directly between the offending tree and sewer line. Repeat annually to prevent root growth in between tree roots and sewer lines.

Residential 4" sewer lines up to 50 ft. utilize a 2 lb. jar **[Optional: "utilize a 2 lb. sealed plastic bag"]**: **[Optional Statements: For product packaged in a jar the following directions will be used]** -Add entire contents of a 2 lb jar into a pail or bucket and mix the two components that were in the jar thoroughly. **[Optional Statements: For product package in a sealed plastic bag the following directions will be used]** - Remove the 2 lb. sealed plastic bag from the outer container **[Optional: jar or box]**. remove the plastic tie in the middle of the bag which separate the two dry components, the white chemical A and the brown chemical B. Be careful not to puncture or tear the bag during this process. After you have removed the plastic tie, grab each end of the bag and begin to mix the chemicals, by shaking the bag vigorously from the side to side. A proper mixture has been achieved when both chemicals A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes. Carefully cut open one end of the bag. Then slowly pour the ROOTX mixture into the toilet bowl slowly, or a sewer clean out if

[SIDE/BACK PANEL]

available. When applying into the toilet make sure to flush immediately after emptying the contents into the bowl. This will help avoid the foam overflowing the bowl. Make sure that when you are pouring the chemical into the application site you do not create a splash which could come in contact with user's eyes. The user must wear chemical-resistant gloves at all times when handling the product. When applying into a sewer clean out, flush the toilet one time **[Optional Statement: or up to 3 times for 1.6 gallon low flow toilets]**, or add 3-5 gallons of water behind it to push the foam completely through the sewer line. Restrict water usage from four to six hours after application.

Residential 4" sewer lines up to 100 ft. or 6" sewer lines up to 75 ft. utilize a 4 lb jar **[Optional Statement: "utilize a 4 lb. sealed plastic bag"]**: **[Optional Statements: For product packaged in a jar the following directions will be used]** - Add entire contents of a 4 lb jar into a pail or bucket and mix the two components that were in the jar thoroughly. **[Optional Statements: For product package in a sealed plastic bag the following directions will be used]** - Remove the 4 lb. sealed plastic bag from the outer container **[Optional: jar or box]**. remove the plastic tie in the middle of the bag which separate the two dry components, the white chemical A and the brown chemical B. Be careful not to puncture or tear the bag during this process. After you have removed the plastic tie, grab each end of the bag and begin to mix the chemicals, by shaking the bag vigorously from the side to side. A proper mixture has been achieved when both chemicals A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes. Carefully cut open one end of the bag.

Then slowly pour the ROOTX mixture into the sewer clean out. Make sure that when you are pouring the chemical into the application site you do not create a splash which could come into contact with the user's eyes. Add 3-5 gallons of water behind it to push the foam completely through the sewer line. It is not recommended that a 4 lb **[Optional: jar or bag]** be applied through a toilet because of the probability of a foam overflow. The user must wear rubber gloves at all times when handling the product, as it is harmful when absorbed through the skin. Restrict water usage from four to six hours after application.

Directions for FDU 100 Method

1. Preparing for Application After determining the correct Orifice size for the FDU 100, take the FDU 100 along with the ROOTX Chemical, to the upstream manhole, where the ROOTX application will begin. Place the cleaner hose with cleaner nozzle into downstream manhole, as in normal operation, and send the hose with nozzle to the upstream manhole where the ROOTX application will begin. Once the cleaner hose has reached the upstream manhole, pull the hose out of the manhole and lay it on top of the ground.

You should now have your cleaner hose, ROOTX Chemical bags, FDU 100 with Foam Dispersal Nozzle, Plastic Locking Pin, Transfer Tube and Rubber O-Rings at the upstream manhole where the ROOTX application will begin.

[SIDE/BACK PANEL]

Suggestions: To prevent having to enter a manhole to retrieve the cleaner hose, it is recommended that a Single Wire Hydraulic hose, 15-20 feet in length, 3/4" or 1" in diameter, be used as a leader hose which can then be attached to the cleaner hose. Attach the cleaner nozzle to the leader hose and send it to the upstream manhole, use a long pole with a hook on the end to pull the leader hose out of the manhole. This makes retrieval of the cleaner hose much easier and does not require that someone enter the manhole to retrieve the hose. Another suggestion is that the cleaner operator introduces slack in the cleaner hose, which will make it easier to retrieve at the upstream manhole.

2. Mixing the ROOTX Chemical While wearing rubber gloves and a dust mask, open the ROOTX box which contains two 20# bags of ROOTX Chemical. The FDU 100 is designed to hold one 20# bag of ROOTX Chemical, which is sufficient to treat up to 400 ft. of 6-18" pipe. Take one ROOTX bag and remove the plastic tie in the middle of the bag which separate the two dry components, the white chemical A and the brown chemical B. Be careful not to puncture or tear the bag during this process. After you have removed the plastic tie, grab each end of the bag and begin to mix the chemicals, by shaking the bag vigorously from the side to side. A proper mixture has been achieved when both chemicals A and B form a tan mixture of white and brown chemicals. This process should take approximately two minutes.

WARNING: A carbon Dioxide (Co2) buildup will occur during the mixing process. In the event that the bag should become so full of Co2 gas that it may break, you should open a small hole in the end of the bag to release the gas, then continue the mixing process until you achieve a proper mixture.

3. Attaching the Transfer Tube After a proper mixture has been achieved, open the end of the narrow part of the bag with either scissors or a knife. Open just the end where the bag has been sealed. Take the Transfer Tube which has a single groove at one end and two grooves at the other end, and insert it into the opening you have created, single groove end first. Then place the rubber O-rings over the bag and into the grooves which the bag material is covering, leaving one groove exposed and uncovered on the outside of the bag. The exposed groove will be used in locking the Transfer Tube into the FDU 100.

4. Putting ROOTX Chemical into the FDU 100 You should now have a bag with the ROOTX Chemical mixed to form a tan color and a Transfer Tube attached to the narrow end of the chemical bag. Take the Transfer Tube and slip it into the FDU 100 where the Foam Dispersal Nozzle fits. Take the plastic locking pin and insert it into the locking hole. Push the Plastic Locking Pin in as far as it will go. Lift the bag slowly, letting the chemical flow through the Transfer Tube into the FDU 100. Tap both the chemical bag and the FDU 100 occasionally to make sure you have proper flow and that the chemical is settling into the FDU 100. After completion of the transfer of ROOTX Chemical to the FDU 100, pull out the Plastic Locking Pin and remove the Transfer Tube from the FDU 100. Then insert the Foam Dispersal Nozzle into the FDU 100 and lock it into place with the Plastic Locking Pin.

[SIDE/BACK PANEL]

Remove the rubber O-rings from the Transfer Tube out of the narrow end of the bag. Be sure to save your Transfer Tube and rubber O-rings for future applications.

5. Application The FDU 100 should now be filled with 20 pounds of ROOTX Chemical. Attach the cleaner hose to the Inlet End Cap of the FDU 100. Slowly reel in the cleaner hose while lowering the FDU 100 into the manhole. Suggestion: Attaching a string to the Foam Dispersal Nozzle end of the FDU 100 will enable the worker at the upstream manhole to lower the FDU 100 into the hole, while the cleaner operator is pulling the cleaner hose back slowly, without entry, while the operator is slowly retrieving the cleaner hose. The string should be attached in such a manner that it will not hang up in the pipe during the foam spray application. Once the FDU 100 is placed in the hole, the cleaner operator should be signaled to start the water, and only run the cleaner at an engine idle speed. The worker at the upstream manhole should verify that foam is emitting from the nozzle. Once the foam dispersal has been verified, the FDU 100 should be pulled through the pipe at a speed no greater than 20 feet per minute.

The nozzle of the FDU 100 should always be out of the water during the application of ROOTX. This will insure that the chemical is properly dispersed onto the roots. In situations where a high flow is present, it is suggested that the flow be bypassed to keep the nozzle from being submerged or to place the FDU 100 on a skid which will lift the nozzle above the flow level. (The skid would be similar to what is used for a camera or cleaning nozzle).

6. Finished Application The ROOTX application is finished when the FDU 100 reaches the downstream manhole. The cleaner is now turned off and the FDU 100 is retrieved from the downstream manhole. Smaller size pipe requires gently shaking and pulling by the operator at ground level, in order to retrieve the applicator. After the FDU 100 is removed, unhook the cleaner hose and detach the Foam Dispersal Nozzle. Then wash out any excess chemical with a hose, making sure that the wash water goes directly into the sewer through the open manhole. You are now ready for another application.

Direct Application Method

ROOTX is a very flexible product, not only can it be applied in conjunction with a Jetter Truck, but it can also be applied by pouring the ROOTX directly into the sewer or storm line.

1. A 40# ROOTX chemical box contains two 20# bags of pre-packaged chemical. Each 20# bag contains the two components which make up ROOTX. These two components are separated by a center tie.

2. ROOTX is a two component chemical. Both components should be mixed so that proper foaming action is created. This can be done by releasing the center tie which separates the two components and shaking the bag back and forth until the brown and white components are thoroughly mixed.

[SIDE/BACK PANEL]

3. To effectively treat 300 ft. of 8-10 inch line, you must pour 40 pounds of the ROOTX chemical directly into the manhole. Then follow with 25-30 gallons of water to create the foaming action. The foam will move down the line with the flow, leaving a residue throughout the pipe and coating the roots with the root killing chemical.

Storm Line Application

ROOTX may be applied in a storm line by utilizing the FDU 100 method described above. In pipe size larger than 18" or in high flow situations the FDU 100 should be placed on a skid similar to what is used for a camera or cleaning nozzle. This will insure that a sufficient amount of chemical is getting on the roots.

ROOTX may also be applied in storm lines by the Direct Application Method described above. Utilize the following rates for pipe size larger than 10":

- 4-40# Boxes per 12" x 300'
- 6-40# Boxes per 16" x 300'
- 8-40# Boxes per 20" x 300'
- 10-40# Boxes per 24" x 300'
- 12-40# Boxes per 36" x 300'
- Add 50% for 450' lines or longer

Exceptions: Two endangered species of aquatic plants, Krals water plantain (*Sagittaria secundifolia*) and Texas wildrice (*Zizania texana*) may be harmed by drainage of Dichlobenil in storm sewers. Therefore, use and/or discharge of this product from storm sewers is prohibited in Cherokee and DeKulb Counties in Alabama, Chattooga County in Georgia, and Hay County in Texas.

This product should only be used pursuant to the directions on this label. Users of this product assume the risk of any other use of this product.

PESTICIDE STORAGE

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

Storage: Store in a dry place. Avoid storage near food or feed products.

PESTICIDE DISPOSAL

Container Disposal: (Jars) - Completely empty jar by shaking and tapping the sides and bottom to loosen clinging particles. Empty residue into application site, triple rinse.

Dispose of container at local recycling depot (if allowable), sanitary landfill, or by incineration if allowed by state and local authorities. Stay way from smoke.

(Bags) - Completely empty bag by shaking and tapping the sides and bottom to loosen clinging particles. Empty residue into application device or application site. Dispose of bag at a sanitary landfill, or by incineration if allowed by state and local authorities. Stay away from smoke.

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

[SIDE/BACK PANEL]

NOTICE: THERE ARE NO IMPLIED WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR THE PARTICULAR PURPOSE, AND THERE ARE NO OTHER IMPLIED WARRANTIES, EXCEPT AS SPECIFICALLY SET FORTH ON THIS LABEL. MANUFACTURER'S OBLIGATION ON ANY CLAIM IS LIMITED TO REPLACEMENT OF ANY DEFECTIVE PACKAGE OF ROOTX. MANUFACTURER WILL NOT BE LIABLE FOR ANY LOSS, INJURY OR DAMAGES TO PERSONS OR PROPERTY RESULTING FROM FAILURE OR IMPROPER USE OF THE PRODUCT, NOR WILL THE MANUFACTURER BE LIABLE FOR ANY DIRECT, INDIRECT, SPECIAL OR CONSEQUENTIAL DAMAGES OF ANY KIND SUSTAINED BY THE PURCHASER OR USER OF THIS PRODUCT. PURCHASERS AND/OR USERS OF THIS PRODUCT HEREBY WAIVE ANY STRICT LIABILITY OR PRODUCT LIABILITY CLAIM THEY MIGHT HAVE AGAINST THE MANUFACTURER AND/OR SELLER. SELLER AND MANUFACTURER ARE NOT LIABLE FOR ANY USE OF THIS PRODUCT NOT IN COMPLIANCE WITH THE DIRECTIONS ON THIS LABEL.

Revised: 1/10/2005
C:/My Files/General Chemical/Labels/Rootx Label Notification 1-10-05.wpd

Brazos Associates, Inc.®

1806 Auburn Drive • Carrollton, Texas 75007-1451

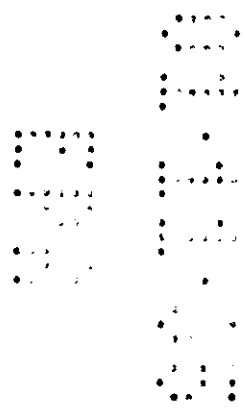
Phone: 972-939-8390 • Facsimile: 972-939-8370

E-mail: michael@brazosassociates.com

By Overnight Courier Delivery

January 10, 2005

Document Processing Desk (PM-25)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202



Attn: Mr. Jim Tompkins
Product Manager Team 25

RE: RootX®
EPA Reg. No. 68464-1

Dear Mr. Tompkins:

This Notification Amendment is being submitted on behalf of our client, General Chemical Company. This Notification Amendment is being filed in accordance with PR-Notice 98-10.

The purpose of the attached Notification Amendment is to:

1. Add the front panel selling claim: "Does Not Contain Copper"; and,
2. To add a Use-Restriction Statement, as is being required by the State of Florida: "NOT FOR USE IN SEPTIC SYSTEMS IN THE STATE OF FLORIDA". (Please refer to the lower section on page 3 of the attached draft label).

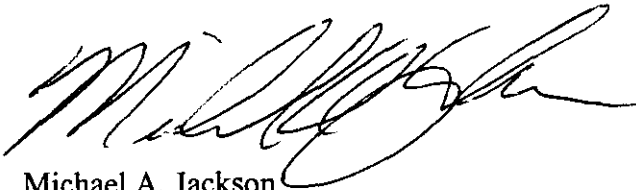
Attached, please find the follow:

1. EPA Form 8570-1
2. One Copy of Draft Labeling with both text additions "underscored".

Mr. Jim Tompkins
January 10, 2005
Page 2

Should you have any questions or need additional information please do not hesitate to contact us.

Sincerely,



Michael A. Jackson
Brazos Associates, Inc.
Agent for General Chemical Co.

Attachments as noted

cc: Mr. Parke Raffensperger - General Chemical Company

