



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 21, 2012

ATTN: Kate Ingram
Ashland Inc.
7910 Baymeadows Way, Suite 100
Jacksonville, FL 32256

Subject: Drewchlor 4107M
EPA Registration Number: 74655-26
Letter Date: April 20, 2012
EPA Receipt Date: April 24, 2012

Dear Ms. Ingram:

The label amendment, submitted in connection with registration under section of the federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed label amendment:

- Add "Precursor" and trademark symbol "TM" to product name.
- Remove redundant statements from label and update company address.
- Addition of label claim for Controlling Growth of Algae in Recirculating Cooling Water Towers from supplier's label (product is a 100% repack).
- Addition of NSF mark and explanatory language to product label.

General Comments:

A stamped accepted copy of the label is enclosed for your record. This amendment and a copy of this letter have been placed in this product's file for future reference. Should you have any questions or comments concerning this letter, please contact Eliza Blair via email at blair.eliza@epa.gov or by telephone at (703) 308-7279.

Sincerely,

A handwritten signature in black ink, appearing to read "Eliza Blair".

for Monisha Harris
Product Manager (32)
Regulatory Management Branch II
Antimicrobials Division (7510P)

DREWCHLOR™ 4107M precursor

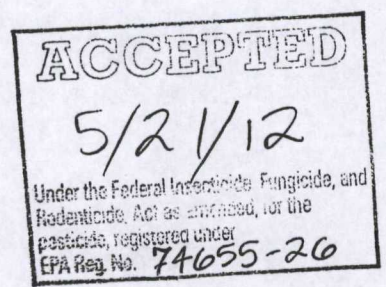
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER. Corrosive. Causes irreversible eye damage and skin burns. May be harmful if inhaled. May be fatal if swallowed. Irritating to nose and throat. Avoid breathing vapor. Do not get in eyes, on skin or clothing. Do not handle with bare hands. Wear protective eyewear (goggles or face shield), clothing and rubber gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse to avoid fire.

ACTIVE INGREDIENT:

Sodium Chlorite*.....	25.0%
INERT INGREDIENTS:.....	75.0%
TOTAL.....	100.0%



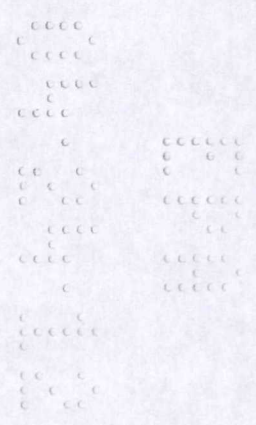
AVAILABLE CHLORINE 39%

CONTAINS 2.58 LBS OF SODIUM CHLORITE PER GALLON

EPA Reg. No. 74655-26

- EPA Est. No. 74655-TX-1
- 5382-KS-1
- 70547-IL-1
- 53345-CN-001
- 53345-CN-004
- 74655-GA-001

Hercules Incorporated, A wholly owned subsidiary of Ashland Inc.
 500 Hercules Rd
 Wilmington, DE 19808
 (302) 594-5000
 Emergency Phone Number
 1-800-ASHLAND (1-800-274-5263)



ENVIRONMENTAL HAZARDS

This pesticide 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

Dry DREWCHLOR™ 4107M is a strong oxidizing agent. Only mix into or dilute with water or non-oxidizable materials. Contamination may start a chemical reaction with the generation of heat, liberation of a hazardous gas (chlorine dioxide) and with a 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. Contact with acids may release toxic gas. Use only clean, dry utensils when handling.

EMERGENCY HANDLING

In case of contamination or decomposition, do not reseal container. If possible, isolate container in an open and well-ventilated area. Flood with large volumes 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.

**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.

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 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.

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.

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

**IN CASE OF EMERGENCY CALL
1-800-ASHLAND**

STORAGE AND DISPOSAL

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

STORAGE: Keep product dry in tightly closed container when not in use. Do not drop, roll or skid drum. Keep upright. Always replace cover. Store this product in a cool, dry area away from direct sunlight and heat to avoid deterioration. In case of spill, flood area with large quantities of water. Do not reuse empty container.

PESTICIDE DISPOSAL: Pesticide wastes are acutely toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot 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.

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

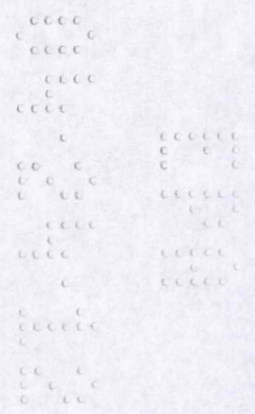
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

CHLORINE DIOXIDE GENERATION

DREWCHLOR™ 4107M is a precursor for the biocidal agent, chlorine dioxide. DO NOT ADD DREWCHLOR™ 4107M directly to the system being treated. Aqueous solutions of chlorine dioxide can be generated from DREWCHLOR™ 4107M by any of the following methods:

1. The chlorine method, which utilizes DREWCHLOR™ 4107M and chlorine gas.
2. The hypochlorite method, which utilizes DREWCHLOR™ 4107M, a hypochlorite solution and an acid.
3. The Acid-Chlorine method, which utilizes DREWCHLOR™ 4107M and an acid
4. The electrolytic method, which utilizes DREWCHLOR™ 4107M and an electrolytic system.

The above generation methods produce a chlorine dioxide concentrate (300-4,000ppm). For some application, the chlorine dioxide concentrate must be diluted prior to use. Your Drew Industrial Division service representative can guide you in the selection, installation and operation of generation systems and the proper injection of chlorine dioxide. Alternatively, consult the instructions for the chlorine dioxide generation systems before using this product. Add the generated chlorine dioxide solution to a point in the system which ensures uniform and adequate mixing and minimal volatilization.



Sanitizer Rinse for Fruits and Vegetables

Use chlorine dioxide generated from DREWCHLOR™ 4107M in food-processing facilities to reduce the growth of microorganisms that cause spoilage and decay of fruits and vegetables.

1. From DREWCHLOR™ 4107M, generate a chlorine dioxide use-solution from 1.0-10.0ppm.
2. Apply the use-solution to pre-process fruits and vegetables by spray or immersion methods at a level that will result in a chlorine dioxide residual ≤ 3.0 ppm. The required dosage will depend on the degree of contamination present.
3. Treatment of the fruits and vegetables must be followed by a potable water rinse or by blanching, cooking or canning.

Final Sanitizing Bottle/Cap Rinse

Use chlorine dioxide generated from DREWCHLOR™ 4107M as a final sanitizing rinse for plastic, glass, or metal returnable and non-returnable bottles/caps/kegs/beverage containers.

1. Prior to sanitization, wash bottles with detergent or cleaning solution and rinse with potable water.
2. From DREWCHLOR™ 4107M, generate a 15-25ppm chlorine dioxide use-solution and rinse bottles/cans/containers with the use-solution. Allow to drain dry.

Sanitization of Conveyors for Food, Dairy and Beverage Processing Plants

Use chlorine dioxide generated from DREWCHLOR™ 4107M in the static or continuous washing, rinsing and sanitizing of conveyor equipment, peelers, collators, slicers and saws.

1. During processing or interruptions in operations, generate a 15-25ppm use solution of chlorine dioxide from DREWCHLOR™ 4107M.
2. Apply the use-solution to the return portion of the conveyor or to the equipment using a coarse spray or other means of wetting the surfaces. Control the volume of the use-solution so as to permit maximum drainage and to prevent puddles. The conveyor may still be damp when food-contact occurs. Treat for at least one (1) minute.

Antimicrobial Rinse of Pre-Cleaned and/or New Returnable or Non-Returnable Containers

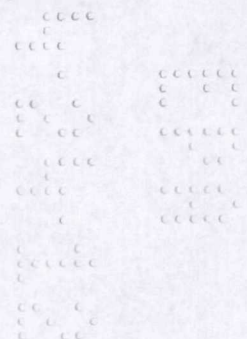
Use chlorine dioxide generated from DREWCHLOR™ 4107M to reduce the number of beverage spoilage microorganisms in pre-cleaned and/or new returnable or non-returnable containers.

1. From DREWCHLOR™ 4107M, generate a 15-25ppm use-solution of chlorine dioxide.
2. Apply the use-solution at a temperature of 25°C to 40°C, with a contact time of 7 seconds.
3. Allow containers to drain thoroughly and then rinse with sterile or potable waters.

Food-Processing Water Systems and Brewery Water

Use chlorine dioxide generated from DREWCHLOR™ 4107M for microbial control in food-processing water systems and brewery water systems, such as flume transport, chill water systems, hydrocoolers, jetter water, pasteurizers, brewery influent or make-up water and bottle rinsing systems.

1. From DREWCHLOR™ 4107M, generate a chlorine dioxide use-solution from 0.1-5.0ppm.
2. Apply the use-solution to the target water system at a level that will result in a residual concentration ≤ 0.0 ppm. The required dosage will vary with process conditions and the degree of contamination present.



Potable Water Treatment

Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for use as both a disinfectant and oxidant in potable water treatment. The required dosage will vary with source water conditions and the degree of contamination present. For most municipal and public potable water systems, a chlorine dioxide dosing concentration of up to 2ppm is sufficient to provide adequate disinfection. Residual disinfectant and disinfectant byproducts must be monitored as required by the National Primary Drinking Water Regulations (40CFR Part 141) and state drinking water standards.

General Environmental Surfaces Sanitization

Use chlorine dioxide generated from DREWCHLOR™ 4107M to sanitize non-food contact surfaces, such as floors, walls, tables, chairs, benches, drains*, troughs and drip pans in food-processing plants, breweries, food-handling establishments, ice-cream and bottling plants and breweries.

1. Prior to sanitization, pre-clean surfaces.
2. From DREWCHLOR™ 4107M, generate a 15-25ppm chlorine dioxide solution.
3. Soak items in/with the 15-25ppm use-solution using mop/wipe, or coarse spray or flood techniques and allow contact for at least one (1) minute.
4. Allow treated surfaces and items to drain adequately and air dry.
5. Fresh sanitizing solution must be made up daily or more often if solution becomes diluted or soiled.

*For drains, this product is not expected to be effective past the trap or elbow in the drain.

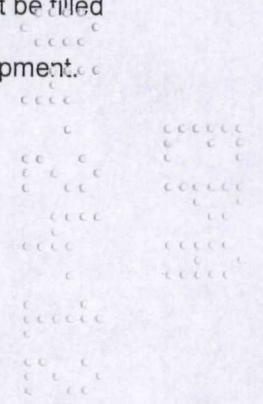
Poultry Processing Water

Use chlorine dioxide generated from DREWCHLOR™ 4107M as an antimicrobial agent in poultry processing water. The residual concentration of chlorine dioxide in the treated water cannot exceed 3ppm. For treatment of poultry chill water, maintain a residual concentration of up to 3ppm of chlorine dioxide in the chiller water, as determined by an appropriate method in accordance with 21 CFR 173.300.

Food-Contact Surface Sanitizer

Use chlorine dioxide generated from DREWCHLOR™ 4107M as a terminal no-rinse sanitizer for controlling pathogenic bacteria on food-contact surfaces, utensils and equipment in food-processing plants, (poultry, meat, seafood), food-handling establishments, breweries, dairies, ice-cream and bottling plants.

1. Prior to sanitization, all surfaces, utensils and equipment must be thoroughly cleaned to remove gross food particles and soil be a pre-flush or pre-scrape and, where necessary, a pre-soak treatment. Then thoroughly wash all surfaces, utensils and equipment with a suitable detergent or cleaner followed by a potable water rinse.
2. From DREWCHLOR™ 4107M, generate a 15-25ppm chlorine dioxide use-solution ("sanitizing solution").
3. Apply the sanitizing solution to the target surface by immersion, coarse spray, mop, wipe, flood or circulation techniques.
4. Allow a contact time of at least one minute. It is essential that the sanitizing solution contact all surfaces to be sanitized. Thus, hard to reach, in-place equipment, pipes and closed vessels must be filled with the solution.
5. Allow the sanitizing solution to thoroughly drain and air dry from all surfaces, utensils and equipment.



Wastewater Treatment

Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for use as a oxidant and disinfectant for odor control or as an oxidant and/or a disinfectant in wastewater treatment. The required dosages will vary with water conditions and the degree of contamination present. For most municipal and other wastewater systems, a chlorine dioxide residual concentration of up to 5ppm is sufficient to provide adequate disinfection. In odor control and wastewater oxidant application, the applied dosage will depend on process water loading and conditions to achieve results and be in compliance with local and state permits.

Bacterial Slime Control in Paper Mills

Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for use as a slimicide in process water during the manufacture of paper and paperboard. Apply the chlorine dioxide use-solution at a level in order to achieve a residual chlorine dioxide concentration in process water from 0.1 to 5.0ppm. The necessary dosage will vary with the degree of microbiological and process contamination present.

Bacterial Slime Control in Oil Wells and Petroleum Systems

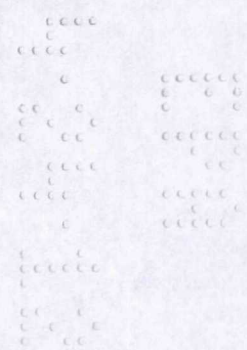
Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for use in the remediation of bacterial and sulfide contamination in oilfield production, injection and disposal fluids. Apply the chlorine dioxide use-solution at a level in order to achieve a residual chlorine dioxide concentration of 0.25-5.0ppm. The chlorine dioxide use-solution can be applied either continuously or intermittently to oil production water as it is separated from the oil and before it is re-injected into the well. For continuous feeds, the chlorine dioxide use-solution may be applied at dosages slightly higher than sulfide's oxidative demand, as determined by a demand study. For intermittent treatment, the chlorine dioxide use-solution must be applied at shock dosage of 200-3000ppm.

Industrial Cooling Water Treatment (Recirculating)

Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for controlling bacterial slime, algae and biofilm in industrial recirculating cooling water systems including reverse osmosis systems. Clean badly fouled systems before starting treatment. The required dosages of the chlorine dioxide use-solution will vary depending on the exact application and the degree of contamination present. The required chlorine dioxide residual concentration range from 0.1 to 5.0ppm. The chlorine dioxide use-solution can be applied either continuously or intermittently. The typical chlorine dioxide residual concentration range is 0.1 – 1.0ppm for continuous doses and 0.1 – 5.0 for intermittent doses.

Industrial Water Treatment (Once-Through)

Use DREWCHLOR™ 4107M to generate a chlorine dioxide use-solution for controlling mollusks and other contaminants (microbiological and macrobiological) in once-through water systems. The required dosages of the chlorine dioxide use-solution will vary depending on the system type, system conditions, the degree of water contamination present and the desired level of control. Depending on the extent of infestation, the chlorine dioxide use-solution may be applied either continuously or intermittently. The residual concentration of chlorine dioxide ranges from 0.10-2ppm for continuous application to 0.1 – 25.0 for intermittent application.



Aqueous Disinfection Systems for CIP Cleaning

Use DREWCHLOR™ 4107M in association with aqueous disinfection systems for CIP cleaning. If the concentration of chlorine dioxide generated from DREWCHLOR™ 4107M exceeds 5.0ppm a potable water rinse should follow treatment. Care should be taken to ensure the biological and chemical quality of potable water.

For Controlling the Growth of Algae in Recirculating Cooling Water Towers

1. Clean badly fouled systems before starting treatment.
2. When algae are visible, add an initial dosage of 8.4 fluid ounces of sodium chlorite per 1,000 gals. of water in the system. Repeat if necessary until control is evident.
3. Where algae control is evident, use a subsequent dose of 4.2 fluid ounces of sodium chlorite solution per 1,000 gals of water in the system twice a week or as needed to maintain control .
4. Add sodium chlorite directly to the cooling tower drip pan (cold water basin) near the inlet to the recirculating pump.



Certified to NSF/ANSI Standard 60, Maximum use level for potable water, 19 mg/L

IMPORTANT NOTICE: Seller warrants that the product conforms to its chemical description and is reasonably 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.

