

74655-28

9/29/2010

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

EPA Reg.

Number:

74655-28

Date of Issuance:

SEP 29 2010

Term of Issuance:

Conditional

Name of Pesticide Product:

DREW™ 3025

NOTICE OF PESTICIDE:

Registration
x Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Ashland Chemical Company
1313 North Market Street
Wilmington, DE 19894

FILE COPY

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

Based on your response to the Sodium Chlorate RED, the EPA has reregistered this product subject to the comments recorded in the succeeding paragraph. This action is taken under the authority of section 4(g) (2) of the Federal Insecticide, Fungicide and Rodenticide Acts, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. The EPA may require submission of data at any time to maintain the registration of the subject product.

1. Make the following label changes:

a. Revise the EPA Registration Number to read "74655".

Signature of Approving Official:

Handwritten signature of Wanda Henson

Wanda Henson,
Acting Product Manager Team-32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Date:

SEP 29 2010

- b. As per the acute toxicity review, the signal word currently on the label, "DANGER", must be revised to read as follows: "CAUTION."
- c. As per the acute toxicity review and PR Notice 2001-1, hotline information must be added to the label to read as follows:

"Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also 1-800-274-5263 or 1-800-ASHLAND for emergency medical treatment information.

- d. As per the acute toxicity review, revise the Hazards to Humans and Domestic Animals section to read as follows:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material.)

- e. As per the acute toxicity review, revise the "First Aid" statements to read as follows:

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 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.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

- f. As per the acute toxicity review, add the following “User Safety Recommendations” section to read as follows:

User Safety

User must wash hands before, eating, drinking, chewing gum, using tobacco, or use the toilet.

User must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.”

- g. As per the acute toxicity review, add the following “User Safety Requirements” section to read as follows:

User Safety Requirements

“Follow manufacturer’s instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water.

Keep and wash PPE separately from other laundry.”

“Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product’s concentrate. Do not reuse them.”

- h. Revise the Environmental Hazards statement by deleting the following text from the section:

“This product is toxic to fish and aquatic organisms.”
Delete the word “Only” from the statement: “For Industrial Use Only”.

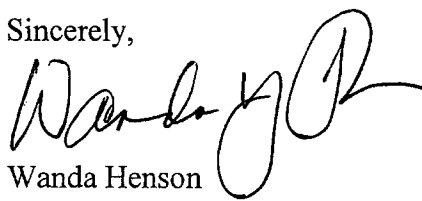
- i. Revise your label to include mandatory language as per PR Notice 2000-5 as follows:
- j. Revise the Feeding section to include: “...Drew 3025 Precursor *must* be fed from...”
- k. Revise the Method of Application section to include: “... Chlorine dioxide *must* always be introduced to the system...”

- l. Revise the cooling tower section to include: "...Chlorine dioxide *must* be added to water well..." and "...For continuous application, a chlorine dioxide residue of 0.10 to 0.25 ppm *must be achieved*. To prevent the settlement of...residual of 0.10 to 0.50 ppm *must be achieved*."
- m. Revise the process water section to include: "...a residual of chlorine dioxide concentration *must* be maintained between 0.10 to 5.00 ppm during feed cycle."
- n. Revise the wastewater disinfection section to include: "...disinfection *is to* be achieved with a chlorine dioxide residual of 0.5 to 5.00 ppm."
- o. Delete the claim for use of this product as a sanitizer. Your label does not include directions for the use of this product as a sanitizer, nor has supporting efficacy data be submitted for review.
- p. Delete the claim for disinfection in the directions for use of this product in the treatment of industrial process water including paper mills. Efficacy data has not been provided to support such as claim.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec.6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Submit two (2) copies of the revised labeling bearing the labeling revisions listed above. A stamped copy of the label is enclosed for your records.

If you have questions concerning this matter, please contact me at (703) 308-6345 or by email at Henson.Wanda@epa.gov.

Sincerely,

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

Enclosures: (Stamped Label)

DREW™ 3025

FOR USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A 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)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Causes moderate eye irritation. Harmful if absorbed through the skin. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Wear protective eyewear (goggles or face shield), rubber gloves, and protective clothing when handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are neoprene and polyethylene. For more information, follow the instructions for category (insert category here) on the chemical-resistance category selection chart. All mixers, loaders, applicators, and other handlers must wear: long sleeve shirt and long pants, and shoes and socks.

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other absorbing materials that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should 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.

PHYSICAL OR CHEMICAL HAZARDS

DANGER: DRY DREW 3025 IS A STRONG OXIDIZING AGENT. Mix only with 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.

ENVIRONMENTAL HAZARDS

This product 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. 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 by cleaning of equipment or disposal of waste. Apply this pesticide only as specified on this label.

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 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.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep product dry in tightly closed container when not in use. Don't drop, roll or skid drums. Keep upright. Always replace cover. Store in a cool, dry, well-ventilated area away from heat or open flame.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, 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. Pesticide wastes are toxic.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. 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 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. Offer for recycling or reconditioning if available, 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.

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 3025 Precursor is mixed with DREW 6006 acid under controlled conditions, it reacts rapidly to form chlorine dioxide and chlorine.

ACTIVE INGREDIENTS:

Sodium Chlorate.....25.0%
Other Ingredients.....75.0%
TOTAL.....100.0%

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

EPA Reg. No. 74655-28 EPA Est. No. (Insert Here)

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 min. Remove contact lenses, if present, after first 5 min, 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 min. 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 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IN CASE OF EMERGENCY CALL
1-800-ASHLAND

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

Sold by:
Hercules Incorporated,
A wholly owned subsidiary of Ashland Inc.

1313 North Market Street
Wilmington, DE 19894
(302) 594-5000

ASHLAND.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FOR INDUSTRIAL USE ONLY

™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.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

SEP 29 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 74655-28

DIRECTIONS FOR USE

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

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

DOSAGE: The GENEROX unit provides 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 KYNA¹, TEFLON², 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 electrochemical. Not for use in the manufacture of paper and paperboard products that will come into contact with food. Consult instructions on the chlorine dioxide generation system before using DREW 3025.

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 and 1.0ppm is desired. If using intermittent application, a residual of chlorine dioxide concentration between 0.10 to 5.00ppm 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 0.50ppm is desired. For continuous application, a chlorine dioxide residual of 0.10 to 0.50ppm 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 and 5.00ppm is desired. If using intermittent application, a residual chlorine dioxide concentration should be maintained between 0.10 to 5.00ppm during feed cycle.

WASTEWATER DISINFECTION: Municipal and industrial sewage and wastewater disinfection can generally be achieved with a chlorine dioxide residual of 0.5 to 5.0ppm.

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.

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