



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 27, 2012

Kate Ingram
Hercules Inc., a wholly owned subsidiary of Ashland Inc.
1313 North Market St.
Wilmington, DE 19894

Subject: Drew™ 3025 Precursor
EPA Registration Number: 74655-28
Letter Date: February 23, 2012
EPA Receipt Date: March 9, 2012

Dear Ms. Ingram:

This acknowledges receipt of the following notification, submitted in accordance with the provisions of PR Notice 98-10 under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c) 9.

Proposed amendments:

- Addition of trademark symbol and "Precursor" to Drew 3025 product name.
- Remove redundant language.
- Replace warranty language.

General comments:

Based on a review of the material submitted, the notification as referenced above is acceptable. A copy of the label has been added to the product's file.

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,

Monisha Harris
Monisha Harris

Product Manager (32)
CONCURRENCES

Regulatory Management Branch II
Antimicrobials Division (7510P)

SYMBOL						
SURNAME						
DATE						



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 74655-28	2. EPA Product Manager Monisha Harris - #32	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Drew 3025	PM# #32	
5. Name and Address of Applicant (Include ZIP Code) Hercules Incorporated, A wholly owned subsidiary of Ashland Inc 1313 North Market St. Wilmington, DE 19894 <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

Amendment - Explain below. Final printed labels in response to Agency letter dated _____

Resubmission in response to Agency letter dated _____ "Me Too" Application.

Notification - Explain below. Other - Explain below.

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

Notification of label revision per PR Notice 98-10 to remove redundant statements and to add trademark symbol and trademark descriptor language to product name for consistency throughout the product label. See attached letter for additional information.

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 Kate Ingram	Title Regulatory Manager	Telephone No. (Include Area Code) (904) 256-0311
---------------------	-----------------------------	---

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 both under applicable law.

2. Signature 	3. Title Regulatory Manager	6. Date Application Received (Stamped)
4. Typed Name Kate Ingram	5. Date February 23, 2012	

February 23, 2012

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

ATTN: Ms. Monisha Harris

Subject: Drew 3025
EPA Registration No. 74655-28
Notification of minor label revision per PR Notice 98-10

Dear Ms. Harris:

Hercules Incorporated, A wholly owned subsidiary of Ashland Inc. is requesting minor label revision to the product label for Drew 3025 to include the following:

- Addition of the trademark symbol, "TM" to the product name
- Addition of the trademark descriptor, "Precursor" to the product name
- Redundant language removed from the product label
- *Replace warranty language*

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 statements 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 the 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.

Enclosed with this cover letter are the following items:

- 1 copy of EPA Form 8570-1
- 2 copies of the product label with changes marked for identification

If there are any questions regarding this application, please contact me at (904) 256-0311 or via email at KRIngram@Ashland.com

Thank you,

Kate Ingram
Kate Ingram
Ashland Inc.

4/8

DREW™ 3025 Precursor

ACTIVE INGREDIENTS:

Sodium Chlorate.....	25.0%
Other Ingredients.....	75.0%
TOTAL	100.00%

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

EPA Reg. No. 74655-28

EPA Est. No. 74655-TX-1

EPA Est. No. 53345-CAN-002

EPA Est. No. 53345-CAN-004

**KEEP OUT OF REACH OF CHILDREN
CAUTION
FIRST AID**

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 first 5 minutes. then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED:

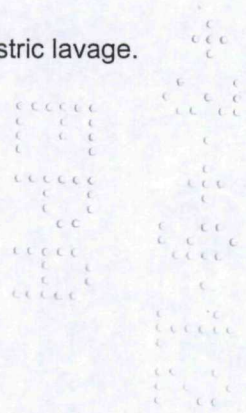
Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything to an unconscious person.

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. You may also call 1-800-274-5263 or 1-800-ASHLAND for emergency medical treatment information.

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



578

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

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.)

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 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 absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY

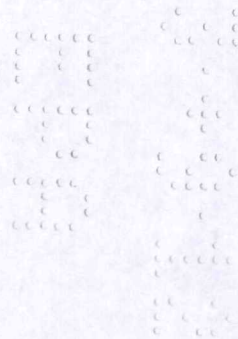
Users must wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users must remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

PHYSICAL OR CHEMICAL HAZARDS

DANGER: DRY DREW™ 3025 Precursor 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

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.

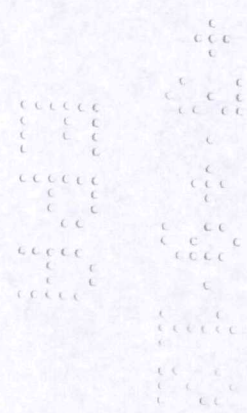
PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous 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. 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. 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.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

FOR INDUSTRIAL USE

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



FOR USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A USE IN THE MECHANICAL GENERATION OF CHLORINE DIOXIDE AS A DISINFECTANT, OR FOR MICROORGANISM CONTROL (ONLY INTENDED FOR THOSE USE SITES INDICATED UNDER THE METHOD OF APPLICATION)

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.

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 must 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 Precursor 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 Precursor.

METHOD OF FEED

Large amounts of chlorine dioxide can be generated from DREW™ 3025 Precursor 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 Precursor.

METHOD OF APPLICATION

Chlorine dioxide generation must take place only under controlled conditions within a chlorine dioxide generator. The generator reacts DREW™ 3025 Precursor 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 must 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 must 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 0.25ppm must be achieved. To prevent the settlement of mollusk veligers in cooling water systems, a chlorine dioxide residual of 0.10 to 0.50ppm must be achieved.

GENERAL INDUSTRIAL PROCESS WATER TREATMENT (WHITE WATER PAPER MILL SYSTEMS, FRESH WATER 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 must be maintained between 0.10 to 5.00ppm during feed cycle.

WASTEWATER DISINFECTION: Municipal and industrial sewage and wastewater disinfection is to be achieved with a chlorine dioxide residual of 0.5 to 5.00ppm.

~~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.~~

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.

™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.

Hercules Incorporated, A wholly owned subsidiary of Ashland Inc.
1313 North Market St.
Wilmington, DE 19894
(302) 594-5000
Emergency Phone Number
1-800-ASHLAND (1-800-274-5263)

