7/26/2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D C 20460

July 26, 2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Kate Ingram Regulatory Manager Hercules Incorporated subsidiary of Ashland Inc 7910 Baymeadows Way, Suite 100 Jacksonville, Fl 32256

Subject DREW 3025 Precursor EPA Reg # 74655-28 Notification Date July 6, 2012 Receipt Date July 9, 2012

Dear Ms Ingram

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

# **Proposed Notification**

To correct mandatory/advisory language (from should to must) on the master text label for "DREW 3025 Precursor" (EPA Reg#74655-28) Label pin punch 7/09/12

# **General Comment**

Based on the review of the material submitted, the notification application is acceptable with one comment Third sentence on page 5, change "An intermitted or a continuous" to read "An intermittent or a continuous"

This notification and this letter have been inserted in your file for future reference

If you have further question on this letter, please contact David Liem at 703-305-1284 or by email at <u>liem david@epa gov</u>

Sincerely ha Na

Acting Product Manager (32) Regulatory Management Branch II Aptimicrobials Division (7510P)

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United States Environmental Protecti Washington DC 20			<u> </u>		Registration Amendment Other		OPP Identifier Number	
		Application	for Pestici	de - Section	l		•	
1 Company/Product Number 74655 28			2 EPA Monis			3 Proposed Classification		
4 Company/Product (Name) Drew 3025 Precursor			<b>РМ#</b> 32					
5 Name and Address of Applicant (Include ZIP Code) Hercules Incorporated A wholly owned sub of Ashland 500 Hercules Rd Wilmington DE 19808			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					
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			Section -	]				
X Amendment Exp   Resubmission in r   Notification Expl	r datod		Final printed labels in response to Agency letter dated					
Amendment per PR N section	otice 2000 5 to modify				ients in the pro	ouuct s		n use
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1 Material This Product Child Resistant Packagini Yes No	······································		Water Soluble F	2 Type of Container Metal Plastic Glass				
* Certification must be submitted	If "Yes Unit Packaging wgt		lf Yes Package wgt	No per container Other (Specify)				
3 Location of Net Contents Information 4 Size(s) Re			stail Container 5 Location of Lab On Labe On Labe					
6 Manner in Which Labe	I is Affixed to Product	Lithograp Paper glu Stenciled	h ed	Other				_
			Section - I	V				
1 Contact Point (Compl	ete items directly below	for identification o	of individual to L	e contacted if ne	cessery to proc	ess this	application )	
Name Kate Ingram			Title Regulatory Manager			Telephone No (include Area Code) (904) 256 0311		
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2 Signature Kitl Arram			Regulatory Manager 3			درر در	د د د	
4 Typed Name Kate Ingram			5 Date 5333 July 6 2012 3333				3	
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Hercules Incorporated A wholly owned subsidiary of Ashland Inc

7910 Baymeadows Way Suite 100 Jacksonville FL 32256

July 6, 2012

US Environmental Protection Agency Document Processing Desk (E-SUB) Office of Pesticide Programs (7504P) Room S4900, One Potomac Yard 2777 Crystal Drive Arlington VA 22202

ATTN MONISHA HARRIS - PM# 32

## 74655-28 – DREW 3025 Precursor Addition of mandatory/advisory language per PR Notice 2000-5

Dear Ms Harris

The purpose of this amendment is to revise the product label to include mandatory/advisory language on the product label per PR Notice 2000-5. It was recognized by EPA Region 5 this language was missing and thus the purpose of this application is to correct this oversight.

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 Ashland Inc



# DREW™ 3025 Precursor

## ACTIVE INGREDIENTS Sodium Chlorate Other Ingredients TOTAL

25 0% <u>75 0%</u> 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

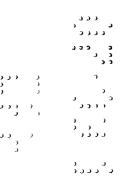
#### IF INHALED

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



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# 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.

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## **EMERGENCY HANDLING**

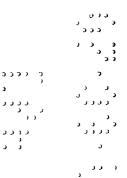
In case of contamination or decomposition do not reseal container. If possible isolate container in open and well ventilated area. Flood with large volumes of water. If fire occurs, extinguish fire by applying large volumes of water. Any unopened drums near the fire should be cooled by spraying with 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 ½ 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.

FOR INDUSTRIAL USE



DRE W.3025 Page 3 of 5 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<sup>™</sup> Precursor is a stabilized non-volatile sodium chlorate formulation specifically designed for use with the patented GENEROX<sup>™</sup> 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<sup>™</sup> 3025 Precursor is mixed with DREW<sup>™</sup> 6006 acid under controlled conditions.

#### 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<sup>™</sup> 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<sup>™</sup> 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<sup>™</sup> unit is constructed entirely of compatible materials DREW<sup>™</sup> 3025 Precursor must be fed from the shipping container or a bulk storage tank of fiberglass or polyethylene construction Equipment constructed of KYNA<sup>1</sup> TEFLON<sup>2</sup> PVC or polyethylene must <del>may</del> be used for handling DREW<sup>™</sup> 3025 Precursor Feed strength solutions of chlorine dioxide must <del>should</del> be fed only through rigid PVC piping

#### FEED REQUIREMENTS

Feed rates of DREW<sup>™</sup> 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<sup>™</sup> 3025 Precursor

#### METHOD OF FEED

Large amounts of chlorine dioxide can be generated from DREW<sup>™</sup> 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<sup>™</sup> 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 a 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.



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**RECIRCULATING AND NON RECIRCULATING AND ONCE THROUGH COOLING WATER** SYSTEMS For control of microbiological and algae contamination in cooling water systems An intermitted or a continuous application must may be used. For continuous application, a residual chlorine dioxide concentration between 0 10 and 1 0ppm must be achieved is desired. If using intermittent application, a residual of chlorine dioxide concentration between 0 10 to 5 00ppm during feed cycle must be achieved 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 must may be used. To remove adult mollusks on an intermittent basis, a chlorine dioxide residual of 0 10 to 0 50ppm must be achieved 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 must may be used. For continuous application, a residual chlorine dioxide concentration between 0.10 and 5.00ppm must be achieved 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 must 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 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

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<sup>1</sup> KYNAR is a registered trademark of Pennwalt Corp

<sup>2</sup> TEFLON is a registered trademark of E I Dupont De Nemours & Co

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)



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