

74655-28

7/26/2012

10 of 8



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 [liem david@epa.gov](mailto:liem david@epa.gov)

Sincerely

A handwritten signature in black ink, appearing to read "Monisha Harris".

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



3028

**ASHLAND.**

**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

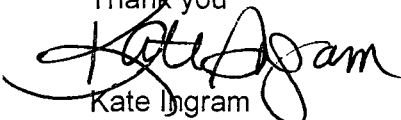
**74655-28 – DREW 3025 Precursor**  
**Addition of mandatory/advisory language per PR Notice 2000-5**

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

3028

**HERCULES**



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**

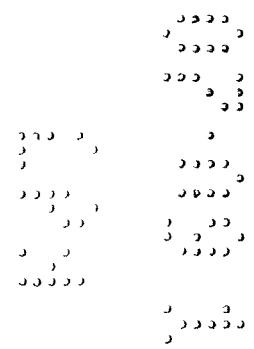
Users must wash hands before eating drinking chewing gum using tobacco or using the toilet Users must remove clothing/PPE immediately if pesticide gets inside Then wash thoroughly and put on clean clothing Users should remove PPE immediately after handling this product As soon as possible wash thoroughly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

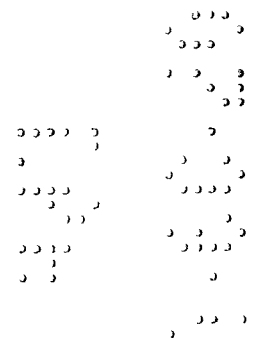
**DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL**

**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.

**FOR INDUSTRIAL USE**





*Intermittent*

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

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