100.0 Comments:

a. Submit revised Confidential Statement of Formulation and in block enter the flash point of the product.

b. Submit product chemistry data for the former 140 CFR part 158.155 through 158.180. We will accept accelerated storage and stability data, date of 30 days at 50°C on an initial 6 stability test must be submitted to the Agency within 15 months after the granting of registration.

c. In the label ingredient statement align the quantity of insect ingredient with the words "Insect Ingredient" and delete word "Insect" in front of declared quantity.

d. Submit analysis and calculation of active oxygen content 11% stated in Product Bulletin. Based on these physical properties enter the value for vapor pressure.

This formulation is cleared under the Federal Food and Cosmetic Act for use on food contact surfaces as a sanitizing rinse at 55-110 ppm hydrogen peroxide 100-200 ppm phosphoric acid.
Note to Efficacy:
Label claim for this product is the NOMINAL concentration.
Note also that ppm's for hydrogen peroxide the upper limit is 100 ppm's higher than FDA recommends.

Note to PM:
Is claim "Health Information" acceptable in Product Bulletin?

Anna Shapiro
12-2-91

Efficacy must be checked to see that lower limit does not fall below efficacy level.

[Signature]
12/12/91