

PRODUCT CHEMISTRY Review

RSB

(12-2-91)

EPA Reg. No. or File Symbol 65402 - R

Date Division Received 9-4-91

Products Manager No. 31(Lee)

Product Name Vigoro Liquid Sanitizer

Company Name FMC Corporation

100.0 Comments:

- a. Submit revised and in block 9 Confidential Statement of Formula and product. the flash point of the
 - b. Submit product chemistry data for the formula the end use product as required in 40 CFR part 158.155 through 158.160. Submit storage and stability data. We will accept accelerated storage and stability data of 30 days at 50°C on an interim basis. The results of 12 months storage and stability test must be submitted to the Agency within 15 months after the granting of registration.
 - c. In the label ingredient statement align the percent of inert ingredients with the words Inert Ingredient and delete word "Inerts" in front of declared percentage.
 - d. Submit analysis and calculations of active oxygen content "1% stated in Product Bulletin. Based on our calculations the available oxygen is 9%.
- Under Physical properties enter the value for Vapor pressure.
- This formulation is cleared under the Federal Food Drug and Cosmetic Act for use on food contact surfaces as a sanitizing rinse. 178.1010 (b) (30) (c) 550 - 1100 ppm hydrogen peroxide 100 - 200 ppm peroxyacetic acid

INERT INGREDIENT INFORMATION IS NOT INCLUDED

(over)

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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 Skopars
12-2-91

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

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