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11 JUN 1984

Re-Oda Chem Engineering Co.
P.O. Box 424
Chagrin Falls, OH 44022

Attention: Mr. C. J. McLaughlin, Jr.

Gentlemen:

BEST DOCUMENT AVAILABLE

Subject: SS-90 Self-Santizer
EPA Registration No. 9687-5
Submission Dated April 20, 1984

Your submission has been reviewed and the following comments apply.

1. The proposed change in the percentage of the Active Ingredient, decreasing the Active Ingredient from 26% to 22% is acceptable, as is the revised Confidential Statement of Formula
2. Please verify the flash point of this product.

The amendment referred to above, submitted in connection with registration under FIFRA is acceptable, provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. In the left panel, replace the sentence "Use 1 1/2 ounces per 100 pounds of S/S 22 in the final rinse cycle" and replace with "In the final rinse cycle, use 1 1/2 ounces of S/S 22 per 100 pounds of dry laundry."
 - b. Replace the words "First Aid" with the words "Statement of Practical Treatment."
 - c. Introduce the Misuse Statement, "It is a violation of Federal law to use this product in a manner inconsistent with its label," just below the "Use Directions." See item 9c of "The Label" enclosure.
 - d. In the left panel, the headings preceding the 2nd paragraph would be

REFERENCES							
DATE	DESCRIPTION	INITIALS	REMARKS	DATE	DESCRIPTION	INITIALS	REMARKS

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Hazards to Humans and Domestic Animals
Danger
Statement of Practical Treatment
In case of contact....
Avoid alcohol. Call a physician immediately.

See items 8, and 8a of "The Label."

- e. On the front panel, replace the words "First Aid" with the words "Additional Precautionary Statements" as "See Additional Precautionary Statements on left panel."
2. The contents of liquid products should be stated in terms of liquid measure.
- a. On the right panel, the container disposal instructions should be grouped under "DISPOSAL" heading. The heading must be of the same minimum type size as required for the child hazard wording. Container disposal instructions should be similar to:

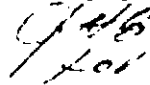
DISPOSAL

Do not reuse empty container.
Rinse empty container thoroughly and discard in trash.

See item 10c of "The Label." Thus the Disposal Statement can be deleted from the front panel.

- b. Submit five (5) copies of your final printed labeling before you release the product for shipment.
- c. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.
- d. A stamped copy of the label is enclosed for your records.

Sincerely yours,



John H. Lee
Product Manager (31)
Disinfectants Branch
Registration Division (TS-767C)

Enclosures

RD-DIS:DCR-44233:J.Lee:Raven:557-2226:bjc:CBI-8A:6/1/84:DL 1.6/18/84