SWEETNAM & SCHWARTZ, LLC

ATTORNEYS AT LAW
1050 Crown Pointe Parkway, Suite 500
Atlanta, Georgia 30338

Edwin Schwartz, Esq.
Telephone 470.395.7842
Facsimile 770.234.6779
Email ess@mseslegal.com

July 19, 2021

VIA ELECTRONIC MAIL

Mr. F. Marshall Binford
Assistant Regional Counsel
US Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: Case No: FIFRA-04-2021-0715
Stop Sale, Use or Removal Order

Dear Mr. Binford:

This letter is to provide the supplemental information requested by the US Environmental Protection Agency, Region 4 ("EPA") during a conference call on July 14, 2021 regarding the response of our client, Seal Shield, LLC (Seal Shield"), to the above-referenced Stop Sale, Use or Removal Order ("SSURO").

1. Website Display

EPA indicated that the website continued to display ElectroClave datasheets that contained references to EPA, which references Seal Shield represented to have been removed. However, refreshing the website revealed that the updated version without reference to EPA was present. EPA requested that this be reviewed by Seal Shield and suggested that a "forced refresh" of the cache may correct the problem.

Seal Shield has reviewed this issue and has taken appropriate measures to resolve the problem. After consultation with its website resource, Seal Shield determined that there are a number of potential causes for an old version of a website being displayed. When using any version of Firefox or certain versions of other browsers, particularly outdated versions, revisiting a website may be identified by the computer and reopened in a previous format. This problem is remedied when the tab is closed, when the tab is refreshed, or if the person closes down the browser entirely, all of which are assumed to constitute the "forced refresh" suggested by EPA. Because these measures are taken by an individual accessing the website, Seal Shield has no control over this. However, as the website host, Seal Shield can, on many (but not all) browsers, delete old cookies and cache stored in website cookies or cache by restarting its servers or directing the vendor on which the website is stored to reset its virtual servers that send new

ED_006151_00002798-00001

caches to the cookies on user browsers. Seal Shield has had all of its virtual servers restarted on Thursday, July 15, which has successfully addressed the concern of EPA. This change is easily verifiable by EPA by accessing the website. As this demonstrates full compliance with these SSURO restrictions, Seal Shield respectfully requests a partial termination of the SSURO regarding the ElectoClave, effective immediately.

2. International Version of Website

EPA expressed a concern about possible international versions of the website that could be accessed by persons within the United States that could create confusion or potentially unlawful claims domestically if the international websites contain antimicrobial or claims which EPA viewed as public health related claims. In response to this concern, Seal Shield has revised coding of the international websites to prevent access to the international sites from the United States.

3. Use of Word "Silver"

EPA expressed a concern that the names of certain Seal Shield products include the word "silver", which may connote an antimicrobial effect. However, the EPA concern prompting this request is not entirely clear. As requested in an email of July 16, 2021, Seal Shield would appreciate a more detailed explanation of this request from EPA, which I can thereafter discuss with Seal Shield.

4. Importation of Antimicrobial Product

I noted during our call that Seal Shield had antimicrobial product in a port in Asia, which product is being held indefinitely as a result of the SSURO. I asked if, once all antimicrobial references are removed from the website and all packaging, whether Seal Shield could thereafter import that product into the United States. Please let me know EPA's position on this importation and provide an explanation for the same.

Please feel free to contact me at the above telephone number if you have any questions regarding this letter.

Sincerely,

Edwin Schwartz

Edwin Schwartz

Cc: Andrew McCarthy