UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:	)	**PARTIAL TERMINATION**
	)	**TO STOP SALE, USE, OR**
Seal Shield, LLC	)	**REMOVAL ORDER**
	)	FIFRA-04-2021-0715
	)	
Respondent.	)	
	)	

1. On June 24, 2021, the U.S. Environmental Protection Agency issued a Stop Sale, Use or Removal Order ("SSURO") to the Respondent, Seal Shield, LLC (hereinafter "Seal Shield"), authorized under Section 13(a) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended ("FIFRA"), 7 U.S.C. § 136k(a). Pursuant to the SSURO, Seal Shield is prohibited from offering for sale, selling, distributing, using or removing any of the unregistered pesticides identified in paragraph 27 of the SSURO, or the misbranded pesticide device identified in paragraph 36 of the SSURO, the ElectroClave UV-C Disinfectant System (hereinafter, the "ElectroClave device"), without first obtaining written approval from the EPA.
2. On July 7, 2021, the EPA received a letter from Seal Shield's attorney via email in response to the SSURO which advised, inter alia, that "[a]ll references to the EPA have been removed from the Seal Shield website, including the reference the EPA interpreted as an endorsement by the EPA of the ElectroClave." The letter advised that, "[t]his can be confirmed by the EPA review of the current Seal Shield website," and requested an immediate partial termination of the SSURO regarding the ElectroClave.
3. Upon review of the revised Seal Shield website, the EPA observed that the website still contained references to the EPA in the Product Data Sheet for the ElectroClave, which included statements that directly or indirectly imply that the ElectroClave is recommended or endorsed by the EPA.

ED_006804_00000103-00001

4. On July 13, 2021, the EPA notified Seal Shield that it had observed continuing references to the EPA on the website and requested that Seal Shield remove the references. During a call on July 14, 2021, and in a letter dated July 19, 2021, Seal Shield explained the steps it had taken to remove references to the EPA from the website. Based on Seal Shield's explanation, the EPA determined that Seal Shield appeared to be in compliance with the requirements of the SSURO and FIFRA with respect to the ElectroClave device.
5. On July 22, 2021, upon request by the EPA, Seal Shield submitted a certified statement from an authorized company official certifying that Seal Shield had taken the necessary steps to come into compliance with the SSURO and the requirements of FIFRA with respect to the ElectroClave device referenced in paragraph 36 of the SSURO.
6. Accordingly, the EPA hereby terminates the provisions of the SSURO that prohibit the sale and distribution of the ElectroClave device referenced in paragraph 36 of the SSURO. This Partial Termination of the SSURO does not apply to the unregistered pesticide products identified in paragraph 27 of the SSURO, and all of the provisions of the SSURO applicable to the unregistered pesticide products remain in full effect unless and until the EPA revokes, terminates, suspends, or modifies the SSURO.
7. This Partial Termination of the SSURO shall not act as a waiver by the EPA of any enforcement or other authority available to the EPA under FIFRA nor shall it act to release the Respondent, Seal Shield, from any potential liability for violations of FIFRA that may have occurred prior to, or subsequent to the issuance of this Partial Termination.
8. This Partial Termination to the SSURO shall be EFFECTIVE IMMEDIATELY upon receipt by the Respondent, Seal Shield.

CAROL KEMKER Digitally signed by CAROL KEMKER Date: 2021.08.03 11:30:28 -04'00'

_____ Date

Carol L. Kemker
Director
Enforcement and Compliance Assurance Division