Bio-Gate, AG  
Fahrenheitstrasse 11  
German 28359 Germany

AGENT: Technology Sciences Group, Inc.  
1150 18th Street, NW  
Suite 1000  
Washington, DC 20036

Attention: Erin M. Tesch

Subject: MicroSilver BG-R  
EPA Registration No: 84146-1  
Notification Dated April 21, 2010

This will acknowledge receipt of your notification for the following additional alternate brand names, submitted under the provisions of FIFRA Section 3©(9). Based on a review of the submitted material, the following comments apply.

**ADDITIONAL BRAND NAME**

MicroSilver BG-Tec

**General Comments**

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your file.

If you have any questions concerning this letter, please feel free to contact Zebora Johnson at (703) 308-7080.

Sincerely,

[Signature]

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobial’s Division (7501P)
Application for Pesticide - Section I

1. Company/Product Number
   84146-1

2. EPA Product Manager
   Marshall Swindell

3. Proposed Classification
   - None
   - Restricted

4. Company/Product (Name)
   MicroSilver BG-R

5. Name and Address of Applicant (Include ZIP Code)
   Biogate AG
   Fahrenheitstrasse 11
   Bremen 28359
   Germany

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)
   (b)(1), my product is similar or identical in composition and labeling
   to:

   EPA Reg. No. ____________________________

Product Name

Section - II

- Amendment - Explain below.
- Resubmission in response to Agency letter dated _________________________
- Notification - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

An alternate brand name, "MicroSilver BG-Tec", has been added to the master label per PR Notice 98-10. Please confirm with Erin Tesch: etesch@tsgusa.com or via fax (202) 872-0745.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formulation for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

   - Child-Resistant Packaging: Yes [ ] No [ ]

   - Unit Packaging: Yes [ ] No [ ]

   - Water Soluble Packaging: Yes [ ] No [ ]

   * Certification must be submitted

   - If "Yes":
     - Unit Packaging wgt.: __________
     - No. per container: __________

   - If "Yes* Package wgt.: __________

4. Size(s) Retail Container
   - Label: 10, 300, 500, and 2000 g

5. Location of Label Directions

6. Manner in Which Label is Affixed to Product
   - Lithograph
   - Paper glued
   - Stenciled

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

   - Name: Erin M. Tesch, Technology Sciences Group, Inc.
   - Title: Regulatory Consultant
   - Telephone No. (Include Area Code): (202) 828-8966

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature
   ________________________________

3. Title
   Regulatory Consultant to Bio-Gate AG

4. Typed Name
   Erin M. Tesch

5. Date
   4/21/10
Mr. Marshall Swindell  
Office of Pesticide Programs  
Antimicrobial Division (7504P)  
Office of Pesticide Products  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

April 21, 2010

RE: MicroSilver BG-R  
(EPA Reg. No. 84146-1)  
Notification for Label Changes per PR Notice 98-10

Dear Mr. Swindell:

Technology Sciences Group Inc., on behalf of Bio-Gate AG, is submitting the enclosed notification to add an alternate brand name, “MicroSilver BG-Tec”, to the master label. The enclosed label includes the change identified above.

You will find the following included with this submission:

1) EPA Application Form;
2) One redline version of the revised label;
3) Three clean copies of the revised label; and
4) Letter authorizing TSG to act on behalf of Bio-Gate AG.

Please do not hesitate to contact me directly with any questions and/or concerns at (202) 828-8966 or via e-mail: etesch@tsgusa.com.

Sincerely,

Erin M. Tesch  
Regulatory Agent for Bio-Gate AG
MicroSilver BG-Tec

For Use in the Manufacture of Commercial and Consumer Products to Impart Antimicrobial Properties

MicroSilver BG-Tec is an antimicrobial additive that safely and effectively inhibits the growth of stain and odor causing bacteria, mold, and mildew on the product in which it is added or applied.

Active Ingredient:
Silver .................................................................................................................. 100%

TOTAL: 100%

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA REG. No. 84146-1
EPA EST. No. 084146-DEU-001

Manufactured by Bio-Gate AG
Fahrenheitstrasse 11
28359 Bremen
GERMANY

SEE SIDE PANEL FOR PRECAUTIONARY STATEMENTS

Please refer to the Technical Bulletin for information concerning uses.

DIRECTIONS FOR USE:
It is a violation of federal law to use this product in a manner inconsistent with its labeling.
MicroSilver BG-Tec is a bacteriostatic agent for processing or manufacturing use only. Formulators are responsible for obtaining registrations for their own end use products.
### PRECAUTIONARY STATEMENT

#### CAUTION

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Harmful if swallowed, inhaled, or absorbed through the skin. May cause eye irritation. Prolonged skin contact may cause skin irritation and/or dermatitis. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

### FIRST AID

#### If in eyes
- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if applicable, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

#### If swallowed
- Call a poison control center or doctor immediately.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Have person sip a glass of water if able to swallow.
- Do not give anything to an unconscious person.

#### If inhaled
- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for treatment advice.

#### If on skin or clothing
- Take off contaminate clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

- **HOT LINE NUMBER:** 1-800-873-1138
- Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a national Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

### STORAGE AND DISPOSAL

<table>
<thead>
<tr>
<th>Storage</th>
<th>Keep tightly closed in a dry, cool and well-ventilated place. Avoid dust formation. Dust may form explosive mixture in air. Keep container closed to prevent contact with moist air. Do not store in area where food or feed may come in contact with the product. Keep away from direct sunlight.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disposal</td>
<td><strong>Pesticide Disposal:</strong> Unused material should be disposed of in accordance with federal, state and local environmental control regulations. <strong>Container Disposal:</strong> Emptied container retains product residue. Triple rinse. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities</td>
</tr>
</tbody>
</table>

MicroSilver BG-Tec (84146-1)
Notif to add alternate brand name, 4-21-10
Page 2 of 5
MicroSilver BG-Tec

For Use in the Manufacture of Commercial and Consumer Products to Impart Antimicrobial Properties

TECHNICAL BULLETIN

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

MicroSilver BG-Tec is intended for use in the manufacture of the products listed below to impart antimicrobial properties. MicroSilver BG-Tec inhibits the growth of stain and odor causing bacteria, mold, and mildew on the product to which it is applied. Products containing MicroSilver BG-Tec may not make claims of antimicrobial activity other than protection of the article itself against growth of bacteria, mold, and mildew.

This product is not approved for any food contact or food packaging uses. This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.

MAXIMUM CONCENTRATION: MicroSilver BG-Tec may be incorporated into the types of products listed below at maximum concentration of no more than one (1) percent on a weight basis of the finished products.

1). Ceramics, ceramic glazes, porcelain enamels, and other glasses.

Specific materials: vitreous china, ceramics, glazes, earthenware, stoneware, dental glasses, borosilicate glasses, lead glasses, soda lime glasses, special glasses, porcelains, porcelain enamels, clays, concretes, and grouts.

Applications: Applications include toilets, sinks, urinals, bidets, lavatories, bathtubs, tile, flooring, windows, shower doors, shower walls, shower trays, bath and kitchen accessories, countertops, handles and knobs.

This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.

2). Plastics and plastic composite materials.

Specific materials: Resins including alkyds, amino resins, (melamine formaldehyde and urea formaldehyde), polyester (PET, PBT, and PEN), polyamide (Nylon), polyimide, polypropylene (PP), polyethylene (PE), polybutylene, polymethyl-pentene (PMP), polysiloxane, polyvinyl alcohol, (PVOH), polyvinyl acetate (PVA), ethylene vinyl acetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC), epoxies, phenolic, polycarbonate, celluosics, cellulose acetate, polystyrene, polyurethane, acrylic, polymethyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS), acrylonitrile-styrene-acrylonitrile copolymer (ASA), acetals, polyketones, polyphethylene, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymer and fluoropolymers, amino resins, thermoplastic elastomer, rubber (including styrene, butadiene, common acrylonitrile rubber, CR) polyacetal (polyoxymethyleneP, and blends and copolymers thereof.
Applications include toilet seats, toilets, sinks, urinals, bidets, lavatories, bathtubs, spas, tile, flooring, shower doors, shower walls, shower trays, bath and kitchen accessories, plumbing supplies and fixtures, countertops, handles, knobs, automobile parts, shower curtains, mats, protective covers, waste containers, general purpose containers, shower heads, ops, brooms, tapes, packaging, gaskets, pipes, tubing, pipe fittings, whirlpool tub and spa components, structural reinforcement composites (e.g., fiber reinforced resin backings), furniture, HVAC parts and equipment, window blinds, tools, keyboards, personal grooming equipment, footwear including boots, sports equipment, telephones, and computer equipment.

This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.

3) Fibers.

Specific materials: Resins including polyester ("Dacron" PET, and PTT), acetate, polyolefins, polyamides (Nylon), polypropylene (PP), polyethylene (PE), acrylics, viscose, polyurethane, "Rayon", polyvinyl alcohol (PVOH), polyvinyl chloride (PVC), polyvinylidene chloride, polysaccharides, and blends and copolymers thereof.

Applications include fabrics for household applications, components of aircraft interiors, home furnishings, automotive fabrics, and apparel.

This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.

4) Coatings

Types of coatings: All application methods including water borne, nonaqueous solvent borne, 100% solids, physical vapor deposition, radiation cure, thermal cure, liquid, slurry, and powder coatings.

Specific materials: Resins including alkyds, amino resins, (melamine formaldehyde and urea formaldehyde), polyester (PET, PBT, and PEN), polyamide (Nylon), polylimide, polypropylene (PP), polyethylene (PE), polybutylene, polymethylpentene (PMP), polysiloxane, polyvinyl alcohol, (PVOH), polyvinyl acetate (PVA), ethylene vinyl acetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC), epoxies, phenolic, polycarbonate, cellulosics, cellulose acetate, polystyrene, polyurethane, acrylic, polyvinyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS), acrylonitrile-styrene-acrylic copolymer (ASA), acetals, polyketones, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymer and fluoropolymers, amino resins, thermoplastic elastomer, rubber (including styrene, butadiene, common acrylonitrile rubber, CR) polyacetal (polyoxymethylene), and blends and copolymers thereof.

Applications include toilet seats, toilets, sinks, urinals, bidets, lavatories, bathtubs, spas, tile, interior paint, flooring, shower doors, shower walls, shower trays, bath and kitchen accessories, plumbing supplies and fixtures, countertops, handles, knobs, automobile parts, shower curtains, mats, protective covers, waste containers, general purpose containers, shower heads, maps, brooms, tapes, packaging, gaskets, pipes, tubing, pipe fittings, whirlpool tub and spa components, structural reinforcement composites (e.g., fiber reinforced resin backings), furniture, HVAC parts and equipment, window blinds, tools, keyboards, personal grooming equipment, footwear including boots, sports equipment, telephones, and computer equipment.
This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.

5). **Adhesives and Sealants.**

Specific materials: Resins including alkyds, amino resins, (melamine formaldehyde and urea formaldehyde), polyester (PET, PBT, and PEN), polyamide (Nylon), polyimide, polypropylene (PP), polyethylene (PE), polybutylene, polymethylpentene (PMP), polysiloxane, polyvinyl alcohol, (PVOH), polyvinyl acetate (PVA), ethylene vinyl acetate (EVA), polyethylene copolymer, polyvinyl chloride (PVC), epoxies, phenolic, polycarbonate, cellulosics, cellulose acetate, polystyrene, polyurethane, acrylic, polymethyl methacrylate, acrylonitrile-butadiene-styrene copolymer (ABS), acrylonitrile-styrene-acrylic copolymer (ASA), acetals, polyketones, polyphenylene, polyphenylene sulfide, polyphenylene oxide, polysulfones, liquid crystal polymer and fluoropolymers, amino resins, thermoplastic elastomer, rubber (including styrene, butadiene, common acrylonitrile rubber, CR) polyacetal (polyoxyymethyleneP, and blends and copolymers thereof.

Applications include toilet seats, toilets, sinks, urinals, bidets, lavatories, bathtubs, spas, tile, flooring, shower doors, shower walls, shower trays, bath and kitchen accessories, plumbing supplies and fixtures, countertops, components of aircraft interiors, handles, knobs, automobile parts, shower curtains, mats, protective covers, waste containers, general purpose containers, shower heads, mops, brooms, tapes, packaging, gaskets, pipes, tubing, pipe fittings, whirlpool tub and spa components, structural reinforcement composites (e.g., fiber reinforced resin backings), furniture, HVAC parts and equipment, window blinds, tools, keyboards, personal grooming equipment, footwear including boots, sports equipment, telephones, and computer equipment.

This product may not be used for any applications involving food contact, food packaging, or storage of human drinking water.