



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 25, 2016

Megan Priest
Regulatory Consultant
Technology Sciences Group Inc.
1150 18th Street, NW, Suite 1000
Washington D.C. 20036

Subject: Notification per PRN 98-10 – Alternate Brand Name and Minor Label Revisions
Product Name: Product EP 10%
EPA Registration Number: 84189-2
Application Date: July 7, 2016
Decision Number: 519366

Dear Ms. Priest:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

The alternate brand name “RUCO-BAC AGP” has been added to the product record.

If you have any questions, you may contact Aline Heffernan at 703-347-8602 or via email at heffernan.aline@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Chao".

Julie Chao, Product Manager 33
Regulatory Management Branch 1
Antimicrobials Division (7510P)
Office of Pesticide Programs

Optional language is in parenthesis

MASTER LABEL

ABN Notification

July 7, 2016 July 25, 2013 Revised November 5, 2013

PRODUCT EP 10%

{Alternate Brand Name: RUCO-BAC AGP}

Broad Spectrum Biocide for use in the manufacture of polymers, plastics, textiles, and surface coatings.

Active Ingredient:	
Silver Chloride	1.75%
Inert Ingredients:	98.25%
Total:	100.00%

- Formatted: Font: Bold
- Formatted: Indent: First line: 0.5"
- Formatted: Font: Bold
- Formatted: Font: Bold
- Formatted: Font: Bold

**KEEP OUT OF REACH OF CHILDREN
WARNING**

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye Call a poison control center or doctor for treatment advice
IF ON SKIN	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes Call a poison control center or doctor for treatment advice
IF SWALLOWED	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice Have a person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor Do not give anything to an unconscious person
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-255-3924 in case of emergency.	

NOTIFICATION

84189-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

7/25/2016

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear goggles. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

~~Environmental Hazards:~~ **ENVIRONMENTAL HAZARDS**

-This pesticide is toxic to fish, aquatic invertebrates, oysters, clams, and shrimp. 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.

Net Contents:

Lot/Batch Number: {may appear on container rather than the label}

EPA Reg. No. 84189-~~XX~~2
EPA Est. No. 84189-DEU-001

Manufactured By:

RUDOLF GMBH	ALTVATERSTRASSE 58-64 D-82538 GERETSRIED + 49 (0) 8171 53 0
--------------------	--

Optional language is in parenthesis

MASTER LABEL

[ABN Notification](#)

[July 7, 2016](#) ~~[July 25, 2013](#)~~ ~~[Revised November 5, 2013](#)~~

DIRECTIONS FOR USE:

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

Product EP 10% is a stable broad-spectrum biocide that is effective over a wide pH range (pH 3- pH 11). Product EP 10% can be added at any stage in the processing. It is stable and retains its efficacy at processing temperatures up to 572° F (300° C). Product EP 10% is compatible in a wide range of formulations, and it is unaffected by the presence of particulate matter and most surfactants. Typical applications and the suggested range of concentrations are outlined in the technical datasheet; however, formulations vary and it is essential when first using Product EP 10%, to first challenge test formulations before deciding on an optimum concentration.

Product EP 10% suppresses the growth of algae, mold, mildew, fungi, and bacteria which cause unpleasant odors, discoloration, staining, deterioration or corrosion only. Manufactured products incorporating Product EP 10% may not make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the manufactured product which permits such claims. When incorporated into treated articles, this product does not protect users of any such treated articles or others against food borne or disease causing bacteria, viruses, germs, or other disease causing microorganisms.

Maximum Use Rate: 20,000 ppm of product (400 ppm of silver chloride) by weight of goods (equivalent to 5 lb of product to 100 lb of goods).

APPLICATIONS (Not for use in any application involving food contact, food packaging or human drinking water)

APPLICATION	TYPES OF FINISHED PRODUCTS
<u>Fibers and Textiles</u>	Napkins; wiping cloths; mops; towels; bags; brush bristles; filters; sponges; packaging including bags, sacks, wraps, cushion and absorbent materials, containers; conveyor belts (non-food contact); apparel; commercial and industrial wipes and fabrics; mattress covers pads and filling; pillow covers; sheets; blankets; towels; fiberfill for quilts and pillows; curtains; draperies; carpet and carpet underlay; rugs; upholstery; wall covering fabrics; cushion pads; sleeping bags; automotive and truck upholstery; carpeting; rear decks; truck liners; convertible tops; interior liners; umbrellas; outerwear; apparel; sportswear; sleepwear; trim for outerwear and garments; stockings; socks; hosiery; caps; undergarments; inner liners for jackets; shoes; gloves and helmets; artificial leather; book covers; sails; ropes; tents and other outdoor equipment; tarps; awnings
<u>Adhesives or Sealants</u>	Adhesives and sealants used in the manufacture of: wood; wood and plastic composites; appliances; automotive and vehicle parts; bathrooms; cardboard; ceramic tile; construction materials; glazing for windows; grout and joint compound; paper; pipe sealant and insulation materials; plastic; plumbing adhesives products; rubber; sealants for pipes; showers
<u>Miscellaneous</u>	Cat litter and trays; caulks; drainage and sewage pipes; mortar and concrete admixtures; plaster; spackling; stucco; tiles; toilets

Optional language is in parenthesis

MASTER LABEL

[ABN Notification](#)

[July 7, 2016](#) ~~[July 25, 2013](#)~~ ~~[Revised November 5, 2013](#)~~

APPLICATION	TYPES OF FINISHED PRODUCTS
<u>Plastics:</u> <u>Including films,</u> <u>sheets, slabs, and</u> <u>molded plastic</u> <u>parts</u>	Automobile parts and fittings; bathroom fittings including plumbing supplies and fixtures (including toilet bowl seats); brush bristles; conveyor belts; countertops; floor coverings and floorings; footwear and sportswear; gaskets; general purpose containers; indoor and outdoor furniture; insulation for wire and cable insulators; kitchen and bathroom hardware; liners; mats; mops; plastic film; protective covers; siding for housing; sinks; sponges; tape; tiles; tubing; waste containers; electronic keyboards; door handles; packaging

APPLICATION	TYPES OF FINISHED PRODUCTS
<u>Coating, Films,</u> <u>Laminates, and</u> <u>Paints</u>	Appliances; automobile and vehicle parts; barrier fabrics; building materials and components (such as walls, wallboard, floors, concrete, siding, roofing, shingles, hardware, ceilings, commercial and industrial applications); collection and storage equipment (such as conveyor belts, piping systems, silos, tanks, and process vessels); countertops; furniture; general purpose containers; glazing for cement tile; glazing for vitreous china used in plumbing fixtures (such as toilets, sinks, countertops); industrial equipment; packaging; paper products (such as wipes, tissues, wall coverings, towels, book covers)

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed, by storage or disposal.

PESTICIDE STORAGE: Store in a dry place away from extreme heat and cold (tightly closed at +15C to +25C). Keep container closed when not in use. In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust, or other absorbent material. Scrape up and dispose of in accordance with the information given under PESTICIDE DISPOSAL. Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free to 1-800-255-3924.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Then offer for recycling or reconditioning if available or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY STATEMENT

The information and recommendations in this publication are to the best of our knowledge, reliable. Suggestions made concerning uses or applications are only the opinion of Rudolf GMBH and users should make their own tests to determine the suitability of these products for their own particular purposes. However, because of numerous factors affecting results, Rudolf GMBH MAKES NO WARRANTY OF ANY KIND, EXPRESS OR IMPLIED, INCLUDING THOSE OF MERCHANTABILITY AND FITNESS FOR PURPOSE, other than that the material conforms to its applicable current Standard Specifications. Statements herein, therefore, should not be construed as representations or warranties. The responsibility of Rudolf GMBH for claims arising out of breach of warranty, negligence, strict liability, or otherwise is limited to the purchase of the material. Statements concerning the use of the products or formulations described herein are not to be construed as recommending the infringement of any patent and no liability for infringement arising out of any such use are assumed.

Statements concerning the use of the products or formulations described herein are not to be construed as recommending the infringement of any patent and no liability for infringement out of any such use is assumed.