

82012-1

07-28-2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 28 2011

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. Joe Green  
Counsel to Copper Development Association  
Copper Development Association  
260 Madison Avenue  
New York, New York 10016

Mail to: Joe Green  
Kelley Drye & Warren LLP  
Washington Harbour, Suite 400  
3050 K Street, NW,  
Washington, DC 20007-5108

Subject: Antimicrobial Copper Alloys Group I  
EPA Registration Number 82012-1  
Your Notification Dated June 28<sup>th</sup>, 2011  
EPA Received Date July 1<sup>st</sup>, 2011

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add a logo to the product labeling, is acceptable.

The notification has been made part of the registration file.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

A handwritten signature in black ink that reads "Marshall Swindell".

Marshall Swindell  
Product Manager 33  
Regulatory Management Branch I  
Antimicrobial Division(7510P)



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 82012-1	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Antimicrobial Copper Alloys Group I	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Copper Development Association Inc. 260 Madison Avenue New York, NY 10016 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.) This notification is to add a trademark logo to the label per PR Notice 98-10. 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 formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. (Please see attached continuation).

**Section - III**

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>None</u>
* Certification must be submitted		If "Yes" Unit Packaging wgt.      No. per container	If "Yes" Package wgt      No. per container

3. Location of Net Contents Information  
 Label  Container

4. Size(s) Retail Container  
NA no container

5. Location of Label Directions  
 On Label  
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product  
 Lithograph  
 Paper glued  
 Stenciled  
 Other Attached to Bill of Lading

**Section - IV**

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

Name Joseph J. Green	Title Counsel to CDA	Telephone No. (Include Area Code) 202-342-8849
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**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 Counsel to CDA	6. Date Application Received (Stamped)
4. Typed Name Joseph J. Green	5. Date June 28, 2011	

EPA APPLICATION FOR PESTICIDE (Section II Cont'd)

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.

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# ANTIMICROBIAL COPPER ALLOYS - GROUP I AND ASSOCIATED FABRICATED PRODUCTS MASTER LABEL

The Master Label consists of the label that will accompany the Antimicrobial Alloys and a label that will accompany each product fabricated using a registered alloy from Antimicrobial Copper Alloys - Group I.

## [Alloy Label – Front Panel]

# ANTIMICROBIAL COPPER ALLOYS - GROUP I AND ASSOCIATED FABRICATED PRODUCTS

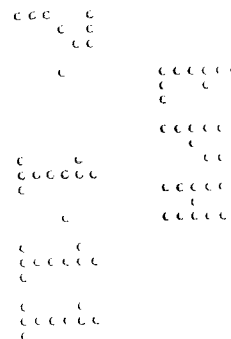
Active Ingredient:

Copper	96.2%
Other	3.8%
Total	100%

EPA Registration No. 82012-1  
EPA Establishment No. \*\*\*\*\*

Made in the United States by \*\*\*\*\*  
Distributed by \*\*\*\*\*

Net Weight: XXX lbs XXX ounces of [brand name]



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## DIRECTIONS FOR USE

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

### Antimicrobial Copper Alloys - Group I

These alloys are only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. [The claims listed on the attached fabricated product label may be made in connection with the marketing and sale of Antimicrobial Copper Alloys - Group I and fabricated products made from Antimicrobial Copper Alloys - Group I under EPA Registration Number 82012-1.]

A list of components that may be fabricated out of Antimicrobial Copper Alloys - Group I is specified below. Antimicrobial Copper Alloys - Group I are not approved for direct food contact or food packaging uses.

### Touch Surface Components

#### *Healthcare Facilities*

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) ( Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts
  - Hospital carts (table surfaces, handles, legs)
  - Computer carts
  - Record carts
  - Phlebotomy carts
  - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars

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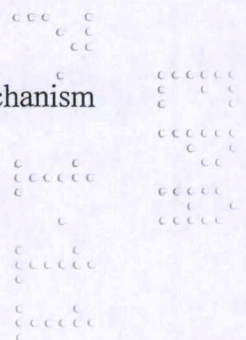
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces ( housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles
  - Medical equipment knobs, pulls and handles for:
    - Drug delivery systems
    - Monitoring systems
    - Hospital beds
    - Office equipment
    - Operating room equipment
    - Stands and fixtures
  - Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs
- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

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- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips
- Name tags
- Patient gown snaps
- Window sills, pulls and locks
- Electrical wallplates

***Community Facilities (including various public and commercial buildings)***

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates



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- Lids of laundry hampers, trash canisters, and other containers
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Badge clips
- Name tags
- Vending machines (non-food contact only)
- Window sills
- Electrical wallplates
- Clip boards
- Office supplies: paper clips, staplers, tape dispensers

***Residential Buildings (including homes, apartments, apartment buildings and other residences)***

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces ( housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)

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- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- Baby cribs: rails, fittings, brackets, supports
- Bowl stands
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

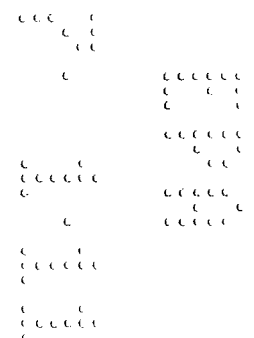
***Mass Transit Facilities***

- Handrails
- Stair rails, tubular railing, and supports; elbows and brackets
- Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- Chairs and benches: rails, backs, legs, seats
- Window sills, pulls, and handles
- Signage
- Vending machines (non-food contact only)

***Other***

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring
- Chapel pews
- Eye glass frames and protective eye wear
- Pens
- Combs
- Ashtrays

**Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.**



Antimicrobial Copper Alloys - Group I - Fabricated Products

The Antimicrobial Copper Alloys - Group I fabricated products listed above may be sold and distributed under EPA Registration Number 82012-1. Products fabricated with Antimicrobial Copper Alloys - Group I must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

**STORAGE AND DISPOSAL**

Dispose of excess by recycling.

**WARRANTY STATEMENT**

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

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# ANTIMICROBIAL COPPER ALLOYS - GROUP I

## Fabricated Product Label

FRONT

[This (touch surface) (product)] made from

### Antimicrobial Copper Alloys - Group I

Active Ingredient:  
Copper ..... 96.2%  
Other ..... 3.8%  
[Total ..... 100.0%]  
See [Back/Side Panel][Insert] for Directions for Use  
Net Weight: XXX lbs XXX ounces of [brand name]

BACK

### ANTIMICROBIAL COPPER ALLOYS - GROUP I

Laboratory testing has shown that when cleaned regularly this surface:

- Continuously reduces bacteria\* contamination, achieving 99.9% reduction within 2 hours of exposure.
- Kills greater than 99.9% of Gram-negative and Gram-positive bacteria\* within 2 hours of exposure.
- Delivers continuous and ongoing antibacterial\* action, remaining effective in killing greater than 99.9% of bacteria\* within 2 hours.
- Kills greater than 99.9% of bacteria\* within two hours and continues to kill 99% of bacteria\* even after repeated contaminations.
- Helps inhibit the buildup and growth of bacteria\* within 2 hours of exposure between routine cleaning and sanitizing steps.
- [This product/component name] is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria within 2 hours.

\* *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa* and, Vancomycin – Resistant *Enterococcus faecalis* (VRE).

### DIRECTIONS FOR USE

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

*Proper Care and Use.* Clean and sanitize according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines. The use of this surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but does not necessarily prevent cross contamination.

This surface may be subject to recontamination and the level of active bacteria at any time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order to have proper antimicrobial effect, this product must be cleaned and maintained according to the directions for use.

**Do not wax, paint, lacquer, varnish, or otherwise coat this product.**

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of this surface. Cleaning agents typically used for traditional hard, non-porous touch surfaces are permissible. The appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of this surface will not impair antibacterial effectiveness.

Not approved for direct food contact or food packaging uses.

[Items exposed to outdoor environmental conditions are not representative of indoor laboratory test conditions, and, therefore, may exhibit reduced efficacy if not cleaned when visibly soiled.]

### STORAGE AND DISPOSAL

Dispose of by recycling or put in trash.

### WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

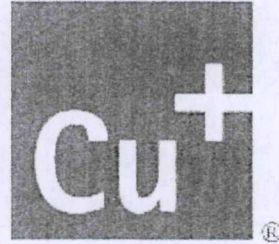
EPA Reg. No. 82012-1  
Manufactured by: [Product Manufacturer Company Name and Address]  
Copper Development Association, 260 Madison Ave., NY, NY 10016-2430

EPA Est. No. [Product Manufacturer Number] 82012-NY-001

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[Optional Logo for Use with Alloy Label or Fabricated Product Label]

Antimicrobial  
Copper



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Changes to label per  
PR Notice 98-10

