

82012-3

4.21.2009

17



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 21 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Heather R. Bjornson
Regulatory Assistant for,
Copper Development Association
260 Madison Avenue
New York, New York 10016

Mail to: Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036

Subject: Antimicrobial Copper Alloys Group III
EPA Registration Number 82012- 3
Your Amendment Dated February 4th, 2009
EPA Received Date February 9th, 2009

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add revise the product labeling by adding additional use sites to the product labeling is acceptable, provided you make the following changes:

Revise the labeling claim, "When cleaned regularly, Antimicrobial Copper Alloys killsafter repeated contamination", to read as follows: "When cleaned regularly, Antimicrobial Copper Alloys kill greater than 99.9% of bacteria* within two hours, and continues to kill 99% of bacteria* even after repeated contamination."

The following use sites must be deleted where ever they appear on the product labeling and hang tag label:

Bedside pitchers
Toothbrush holder
Cup holder

These use sites are considered food contact surfaces.

A clear description of cup holder and bowl stand must be provided to the Agency before these claims can be accepted.

Provide the Agency with the frequency of times a parent, caregiver, and/or employee in a nursery would clean or follow cleaning procedures as per the use pattern of Baby cribs: rails, fittings, brackets, supports. These surfaces would have to be cleaned on a scheduled basis in order to comply with the Agency's labeling requirements for Copper Alloy products. Please note that the product claims continuous and ongoing bacterial action when scheduled cleaning practices and methods are followed.

A stamped copy of the labeling is enclosed for your records.

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

Sincerely,



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

3/17



United States
Environmental Protection Agency
 Washington, DC 20460

| | |
|-------------------------------------|--------------|
| <input type="checkbox"/> | Registration |
| <input checked="" type="checkbox"/> | Amendment |
| <input type="checkbox"/> | Other |

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|--|
| 1. Company/Product Number 82012-3 | 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 III | 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 checked="" 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 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 submission is a fast-track label amendment and not subject to PRIA. Please see the cover letter for details of the proposed label revisions.

Section - III

| | | | | | |
|---|--|---|--|---|----------------------------------|
| 1. Material This Product Will Be Packaged In: | | | | 2. Type of Container | |
| 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 | | <input type="checkbox"/> Metal | <input type="checkbox"/> Plastic |
| | | | | <input type="checkbox"/> Glass | <input type="checkbox"/> Paper |
| * Certification must be submitted | | | | <input checked="" type="checkbox"/> Other (Specify) _____ | none |
| 3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container | 4. Size(s) Retail Container NA- no container | 5. Location of Label Directions <input checked="" type="checkbox"/> | | | |
| 6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled | | <input checked="" type="checkbox"/> 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 Heather R. Bjornson, Technology Sciences Group, Inc. | | Title Regulatory Assistant | | Telephone No. (include Area Code) (202) 828-8945 | |
| <p align="center">Certification</p> <p>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.</p> | | | | | 6. Date Application Received (Stamped) |
| 2. Signature | | 3. Title Regulatory Assistant to Copper Development Assoc. Inc. | | | |
| 4. Typed Name Heather R. Bjornson | | 5. Date February 4, 2009 | | | |

4/17



February 4, 2009

WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

Marshall Swindell, Team 33
Office of Pesticide Programs
US Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: Copper Development Association
Antimicrobial Copper Alloys Groups 1 through 5
EPA Reg. Nos. 82012-1 through 5
Fast-track label amendments

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

Dear Mr. Swindell:

On behalf of the Copper Development Association (CDA), Technology Sciences Group Inc submits the enclosed fast-track label amendments to:

- Eliminate the footnote under the ingredient statement on the current master label, which currently appears as follows:

| | |
|--------------------|--------|
| Active Ingredient: | |
| Copper | 96.2%# |
| Other | 3.8%# |

Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

| | |
|-------|------|
| Total | 100% |
|-------|------|

States have objected to including the actual percentage of copper on the Retail Label and would prefer that the Retail Label reflect the nominal concentration for the Group, consistent with the Master Label. The states believe that this approach will result in less confusion for state inspectors.

- In addition, as a result of discussions with California, we are seeking to make two minor modifications to the claims language. These changes are as follows:

- (1) Delete the underlined text in the current claim, as follows:
"Antimicrobial Copper Alloy surfaces deliver continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9%

CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754



WASHINGTON

1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Telephone 202 223-4392
Fax 202 872-0745

of bacteria* within two hours even after repeated wet and dry abrasion and re-contamination.

(2) Delete the underlined text in the current claim, as follows: "When cleaned regularly, Antimicrobial Copper Alloys surfaces kill greater than 99.9% of bacteria* within two hours, and continue to kill more than 99% of bacteria* even after repeated contamination."

- Lastly, we are adding additional use sites to the label.

SACRAMENTO

712 Fifth Street
Suite A
Davis, CA 95616
Telephone 530 757-1298
Fax 530 757-1299

You will find the following:

- 1) Application Form,
- 2) One redline label version for Groups 1 -5, and
- 3) Three clean copies of the label for each group 1 through five.

If you have any questions, please contact me at 202-828-8945 or by e-mail, hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Assistant, Copper Development Association

CANADA

275 Slater Street
Suite 900
Ottawa, Ontario
K1P 5H9
Telephone 613 247-6285
Fax 613 236-3754

cc: D. Edwards, EPA
H. Michels, CDA
J. Green, Kelley, Drye, Collier, Shannon

Master Label containing:
Sublabel I: Complete Label
Sublabel II: Hang Tag Label

ANTIMICROBIAL COPPER ALLOYS GROUP III⁺

⁺NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

| | |
|-----------|----------|
| Copper | 82.6% |
| Other | 17.4% |
| Total | 100% |

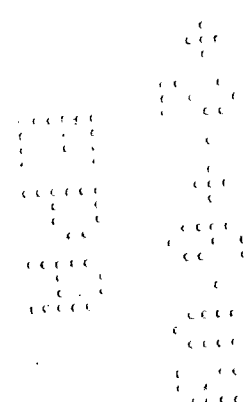
EPA Registration No. 82012-3
EPA Establishment No. *****

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

Net Contents: *****

ACCEPTED
with COMMENTS
to EPA Letter Dated:
APR 21 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, and Executive Order 12739,
registered under Reg. No.
82012-3



7/17

Sublabel I: Complete Label

ANTIMICROBIAL COPPER ALLOYS GROUP III[†]

[†]NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Laboratory testing has shown that when cleaned regularly:

[This surface continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[This surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours.

[This surface kills greater than 99.9% of bacteria* within two hours, and continues to kill 99% of bacteria* even after repeated contamination.]

[This surface helps inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a Copper Alloy 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. The Copper Alloy surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009

Active Ingredient:

Copper
Other

82.6%
17.4%

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the purpose of
registration under FIFRA, No.

Total

82012-3

100%

EPA Registration No. 82012-3

Made in the United States by *****

EPA Establishment No. *****

Distributed by *****

Net Contents: *****

8/17

DIRECTIONS FOR USE

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

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use of Antimicrobial Copper Alloys: The use of Antimicrobial Copper Alloys does not replace standard infection control procedures and good hygienic practices. Antimicrobial Copper Alloys surfaces must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

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

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the Antimicrobial Copper Alloy surface. Cleaning agents typically used for traditional touching surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of Antimicrobial Copper Alloy surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[Antimicrobial Copper Alloys may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

ACCEPTED
APR 21 2009

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is registered under Reg. No. 82012-3

- 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
- 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:

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:
APR 21 2009

Under the Federal Acquisition Regulation, the fact as
 concerned the performance
 requirement of the Reg. No.
82012-3

- 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
- 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

~~_____~~

- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing

~~_____~~

~~_____~~

- Soap holder
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips

ACCEPTED
with **COMMENTS**
in EPA Letter Dated:
APR 21 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is registered with EPA Reg. No.

82072-3

- 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
- 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

**ACCEPTED
with COMMENTS
in EPA Letter Dated:
APR 21 2009**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is a registered pesticide with Reg. No.

82012-3

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)
- 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
- ~~○ [Redacted]~~
- Closet rods and hangers
- Television remote
- ~~○ [Redacted]~~
- ~~○ [Redacted]~~
- Soap holder
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- ~~○ [Redacted]~~
- ~~○ [Redacted]~~
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended through the 1990s, regulation under this Reg. No. 82012-3

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

STORAGE AND DISPOSAL

Antimicrobial Copper Alloys should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

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

ACCEPTED
with COMMENTS
 in EPA Letter Dated:
APR 21 2009
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, the above product is registered under EPA Reg. No.
82072-3

14/17

Sublabel II: Hang Tag Label

FRONT

| |
|--|
| Made from |
| Antimicrobial Copper Alloys Group III |
| Active Ingredient: |
| Copper 82.6% |
| Other..... 17.4% |
| Total 100.0% |
| See Back Panel for Directions for Use |

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended by the FIFRA
reauthorized under EPA Reg. No.

82012-3

BACK

ANTIMICROBIAL COPPER ALLOYS GROUP III

Laboratory testing has shown that when cleaned regularly:

- This surface continuously reduces bacteria* contamination, achieving 99.9% reduction within 2 hours of exposure.
- This surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
- This surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
- This surface kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
- This surface helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of this product 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 it does not necessarily prevent cross contamination.

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. The use of this product does not replace standard infection control procedures and good hygienic practices. This product must be cleaned and sanitized according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

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

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

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 touching surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of Antimicrobial Copper Alloy surfaces will not impair the antibacterial effectiveness of the product.

This product can not be used for any direct food contact or food packaging uses.

Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.

STORAGE AND DISPOSAL

Antimicrobial Copper Alloys Group III should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Antimicrobial Copper Alloys are 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. 82012-3

EPA Est. No. 82012-NY-001

Manufactured by: Copper Development Association, 260 Madison Ave., NY, NY 10016-2401

15/17

Antimicrobial Copper Alloys may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.

Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.

Healthcare Facilities

- o Bedrails, footboards
 - o Over-bed tables
 - o Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
 - o Handrails, (corridor/hallways) (Senior housing), automatic door push plates
 - o Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
 - o Bedrails, assistance rails,
 - o Toilet safety rails
 - o Carts
 - o Hospital carts (table surfaces, handles, legs)
 - o Computer carts
 - o Record carts
 - o Phlebotomy carts
 - o Other Carts (tables/surfaces, shelving, railings, handles, pulls)
 - o Equipment carts (horizontal surfaces, frames, handles)
 - o Door push plates, kick plates, mop plates, stretcher plates
 - o Sinks: spigots, drains, sinks themselves
 - o Faucet: handles, spigot, drain control lever
 - o Water fountains: bubbler head, drain strainer, handle
 - o Alcohol sanitizer dispenser, handle
 - o Paper towel holders, facial tissue holders, toilet paper holders
 - o Air hand dryer, controls and push buttons on air hand dryers
 - o Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
 - o Door handles, doorknobs (outer touch surfaces)
 - o Grab bars in bathrooms showers and bathtubs
 - o Panic bars on emergency room doors
 - o Towel bars
 - o Showerheads
 - o Countertops and tabletops (non-food use only)
 - o Hinges, locks, latches, and trim
 - o Door stops, door pulls, and protector guards
 - o Toilet and urinal hardware, levers, push buttons
 - o Toilet seat inlay for lifting of seat
 - o Closures
 - o Vertical locking arms
 - o Vertical cover guards
 - o Protection bars
 - o Light switches, switch plates
 - o Visitor chairs: armrests, metal frames
 - o Thermostat covers, control knobs and wheels
 - o Telephone handsets and surfaces (housings), keypad
 - o 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)
 - o Floor tiles
 - o Ceiling tiles (non-porous)
 - o Wall tiles
 - o Instrument handles
 - o 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
- o Intravenous (IV) poles, bases, hangers, clips
 - o Trays (instruments, non-food contact)
 - o Pans (bed)
 - o Walkers, wheelchair handles, and tubular components
 - o Computer keyboards: keys, housings, computer mouse surfaces
 - o Exercise and rehabilitation equipment, handles, bars

ACCEPTED
with COMMENTS
in EPA Form 8202-3
APR 21 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended by the FIFRA reauthorization Act, No. 82022-3

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

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009

Under the provisions of the
Emergency and Prevention Act of
1996 (EPCRA) the following
regulations under EPA Reg. No.

82012-3

Community Facilities (Including various public and commercial buildings)

- o Shopping cart handles, child seats, handrails
- o Cash registers: housing, keypads
- o ATM machines: keys, housing
- o Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- o Ice and water dispensers (outer surfaces without water contact)
- o Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- o Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- o Soap holder
- o Soap dispenser (wall mounted): push bar and dispenser itself
- o Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- o Toilet paper dispenser (housing)
- o Windows (crank), Locking mechanism, pull handles
- o Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- o Jalousie Windows (crank)
- o Casement (cranks, levers, hinges)
- o Single and double-hung windows (locks and pulls)
- o Light switches, switch plates
- o Lids of laundry hampers, trash canisters, and other containers
- o Magazine rack
- o Signage
- o Coat rack and hooks
- o Shower curtain rings
- o Radiator cover
- o Bracelets
- o Badge clips
- o Name tags
- o Vending machines (non-food contact only)
- o Window sills
- o Electrical wallplates
- o Clip boards
- o Office supplies: paper clips, staplers, tape dispensers

17/17

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

- o 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)
- o Bedrails, footboards
- o Handrails
- o Stair rails
- o Door push plates
- o Sinks: spigots, drains, sinks themselves
- o Faucet: handles, spigot, drain control lever
- o Paper towel holders, facial tissue holders, toilet paper holders
- o Door handles, doorknobs (outer touch surfaces)
- o Grab bars in bathrooms showers and bathtubs
- o Towel bars
- o Showerheads
- o Countertops and tabletops
- o Hinges, locks, latches, and trim
- o Door stops, door pulls, and protector guards
- o Toilet and urinal hardware, levers, push buttons
- o Toilet seat inlay for lifting of seat
- o Light switches, switch plates
- o Thermostat covers, control knobs and wheels
- o Telephone handsets and surfaces (housings), keypad
- o Floor tiles
- o Ceiling tiles (non-porous)
- o Wall tiles
- o Computer keyboards: keys, housings, computer mouse surfaces
- o Exercise equipment, handles, bars
- o Windows (crank), Locking mechanism, pull handles
- o Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- o Jalousie Windows (crank)
- o Casement (cranks, levers, hinges)
- o Single and double-hung windows (locks and pulls)
- o Television control knobs and buttons
- o Lids of laundry hampers, trash canisters, and other containers
- o Closet rods and hangers
- o Television remote
- o ~~_____~~
- o ~~_____~~
- o Soap holder
- o Magazine rack
- o Coat rack and hooks
- o Shower curtain rings
- o Radiator cover
- o Window sills
- o Electrical wallplates
- o ~~_____~~
- o Bowl stands
- o Office supplies: paper clips, staplers, tape dispensers
- o Monitor (television, computer, etc.) housing

ACCEPTED
with COMMENTS
in EPA Letter Dated:
APR 21 2009

Under the terms of the...
Paragraph... Act as
circulated for the...
regional center... No.
82012-3

Mass Transit Facilities

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

Other

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