

82012-4

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 26, 2014

Joseph J. Green  
Agent for Copper Development Association (CDA)  
Kelley Drye & Warren LLP  
3050 K Street, N.W., Suite 400  
Washington, District of Columbia 20007

Subject: Additional Indoor Non-Food Use Sites  
EPA Reg. No. 82012-4  
Notification Letter Dated August 1, 2014

This letter acknowledges receipt of the Notification identified above submitted under the provisions of section 3(c)(9) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10.

Based on a review of the submitted information, this notification is acceptable. This information has been made a part of your file. Please note that if you would like a stamped label, you must submit an amendment request.

Should you have any questions concerning this letter, please contact Elizabeth Watkins at (703) 347-0241.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth H. Watkins".

Elizabeth Watkins  
Risk Manager  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)

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<p>United States <b>Environmental Protection Agency</b> Washington, DC 20460</p>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:20px; height:20px;"><input type="checkbox"/></td> <td>Registration</td> </tr> <tr> <td style="width:20px; height:20px;"><input checked="" type="checkbox"/></td> <td>Amendment</td> </tr> <tr> <td style="width:20px; height:20px;"><input type="checkbox"/></td> <td>Other</td> </tr> </table>	<input type="checkbox"/>	Registration	<input checked="" type="checkbox"/>	Amendment	<input type="checkbox"/>	Other	OPP Identifier Number
<input type="checkbox"/>	Registration							
<input checked="" type="checkbox"/>	Amendment							
<input type="checkbox"/>	Other							

**Application for Pesticide - Section I**

1. Company/Product Number 82012-4	2. EPA Product Manager Eric Miederhoff	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Antimicrobial Copper Alloys Group IV	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"/> Resubmission in response to Agency letter dated _____  <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application.  <input type="checkbox"/> Other - Explain below.
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**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)  
Notification of additional use sites per PR Notice 98-10. See attached for additional statement.

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>			
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  <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container n/a no container	
5. Location of Label Directions  <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product		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 <u>Attached to bill of lading</u>	

**Section - IV**

<b>1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>		
Name Joseph J. Green	Title Counsel to CDA	Telephone No. (include Area Code) 202.342.8849
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.		6. Date Application Received  (Stamped)
2. Signature 	3. Title Counsel to Copper Development Assoc.	
4. Typed Name Joseph J. Green	5. Date August 1, 2014	

(Attachment)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 C.F.R. 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. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 C.F.R. 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 IV 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 IV.

## [Alloy Label – Front Panel]

# ANTIMICROBIAL COPPER ALLOYS - GROUP IV AND ASSOCIATED FABRICATED PRODUCTS

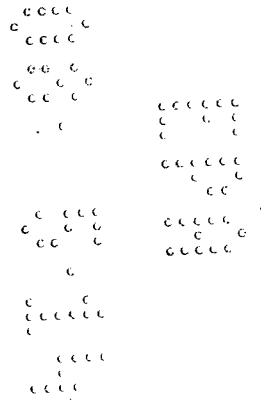
Active Ingredient:

Copper	73.0%
Other	27.0%
Total	100%

EPA Registration No: 82012-4  
EPA Establishment No. \*\*\*\*\*

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

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



### 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 IV

These alloys are only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, laboratories, 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 IV and fabricated products made from Antimicrobial Copper Alloys - Group IV under EPA Registration Number 82012-4.]

A list of components that may be fabricated out of Antimicrobial Copper Alloys - Group IV is specified below. Antimicrobial Copper Alloys - Group IV 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

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- 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:

- 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
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder, dispenser
- 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
- Medical equipment washers: exterior surfaces, housing, handles, pulls

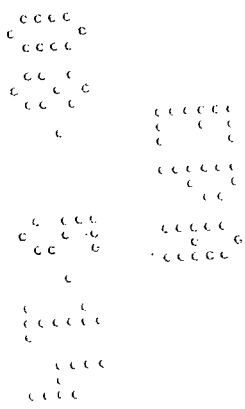
***Community Facilities (including various public and commercial buildings)***

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables
- Exercise equipment, handles, bars
- 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
- Gym/Health Club: locker room seats, benches
- Water fountains: knobs, buttons, handles, drains, push bar, basin
- Restrooms: toilet flush valves, flush buttons, faucet handles, hand dryer activation buttons, soap dispenser push bar/button

***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)





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- 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
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder, dispenser
- 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)
- Elevator buttons

***Laboratories***

- Incubator interior and outside surfaces, including culture chambers, walls, shelving and support brackets, handles, circulating fan assemblies, pan
- Laboratory surfaces: table tops, counter tops, handles, cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs
- Laboratory carts, trays, and pans
- Door handles, knobs, latches and locks

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- Laboratory equipment: safety cabinets, enclosures, vent hoods

**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
- Massager, hand-held: handle, buttons, knobs
- Push/pull device
- Smartphone and tablet covers and cases
- Stylus for touch screens
- Personal headphone touch surfaces
- Hand-held door opening device
- Bottle openers

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

**Antimicrobial Copper Alloys - Group IV – Fabricated Products**

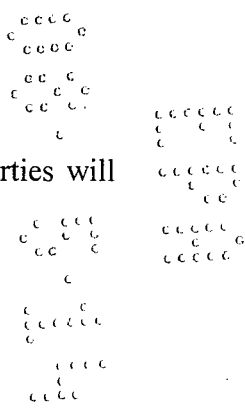
The Antimicrobial Copper Alloys - Group IV fabricated products listed above may be sold and distributed under EPA Registration Number 82012-4. Products fabricated with Antimicrobial Copper Alloys - Group IV must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

**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 IV

## Fabricated Product Label

FRONT

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

### Antimicrobial Copper Alloys - Group IV

Active Ingredient:  
Copper ..... 73.0%  
Other..... 27.0%  
[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 IV

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 impart 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. 82012-4      EPA Est. No. [Product Manufacturer Identifier] 82012-NY-001  
Manufactured by: [Product Manufacturer Company Name and Address]  
Copper Development Association, 260 Madison Ave., NY, NY 10016-240

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

Antimicrobial  
Copper

