

82012-5

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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 V
EPA Registration Number 82012-5
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.

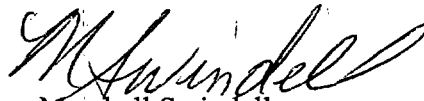
A clear description of cup holder and bowl stand must be provided to the Agency before these claims can be accepted.

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)

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

ANTIMICROBIAL COPPER ALLOYS GROUP V⁺

*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	66.5%
Other	33.5%
Total	100%

EPA Registration No. 82012-5
EPA Establishment No. *****

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

Net Contents: *****

ACCEPTED
with COMMENTS
in EPA Letter Dated:
APR 21 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the products
registered under EPA Reg. No.
82012-5

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Sublabel I - Complete Label

ANTIMICROBIAL COPPER ALLOYS GROUP V⁺

*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 continue 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.

* * * * *

Active Ingredient:

Copper
Other

66.5%
33.5%

Total

100%

EPA Registration No. 82012-5

EPA Establishment No. *****

Net Contents: *****

ACCEPTED
with COMMENTS
in EPA Letter Dated:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended for the pesticide
registered under EPA Reg. No.

82012-5

Made in the United States by *****

Distributed by *****

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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.

[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.]

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

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with COMMENTS
in EPA Letter Dated:

APR 21 2009

Under the Federal Insecticide, Fungicide, and Rodenticide Act, registration of this pesticide is suspended.

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- 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:
 - Drug delivery systems
 - Monitoring systems
 - Hospital beds

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, by the provisions
requested under EPA Reg. No.
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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:

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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the products
registered under EPA Reg. No.

82012-5

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)

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- 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, for the pesticide,
registered under EPA Reg. No.

82012-5

Sublabel II: Hang Tag Label

FRONT

Made from

Antimicrobial Copper Alloys Group V

Active Ingredient:

Copper	66.5%
Other	33.5%
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, for the products
registered under EPA Reg. No.

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BACK

ANTIMICROBIAL COPPER ALLOYS GROUP V

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 a 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 V 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. 82012-5

EPA Est. No. 82012-NY-001

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

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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
 - 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

ACCEPTED
WITH COMMENTS
by EPA Label Desk

APR 21 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the protection
registered under EPA Reg. No.
82012-5

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

ACCEPTED
with COMMENTS
in EPA Letter Dated:

APR 21 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
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82012-5

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

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

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- 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 [REDACTED]
- o Closet rods and hangers
- o Television remote
- o [REDACTED]
- o [REDACTED]
- 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 [REDACTED]
- o [REDACTED]
- 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 Federal Insecticide, Fungicide, and Rodenticide Act as amended, the products registered under EPA Reg. No.

82012-5

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