7/19/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AN POLLUTION PREVENTION

Matthew Brooks
Ag-Chem Consulting
Cupron Inc
12208 Quinque Lane
Clifton Va 20124

JUL 19 2012

Subject

Cupron Cuprous Oxide

EPA Registration No 84542-3

Application Date September 28 2011 Receipt Date September 30 2011

Dear Mr Brooks

The following amendment submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) 3 (c) 7 A as amended is acceptable with conditions

Proposed Amendment

Increasing the rate to treat textiles

Conditions

Revise Label as follows

1 Revise the subheading Container Disposal to read Container Handling under the Storage and Disposal heading on page 4 of your label

General Comments

A stamped label is enclosed for your records Submit (1) one final printed label bearing the revised labeling prior to selling or distributing the product

Should you have any questions concerning this letter you may contact me by telephone at (703) 308-6416 or by e-mail at campbell-mcfarlane-jacqueline@epa-gov or Stacey Grigsby by telephone at (703) 305-6440 or by email at grigsby-stacey@epa-gov during the hours of 8 00 am to 4 00 pm EST. When submission or data in response to this letter a copy of this letter should accompany the submission to facilitate processing.

Sincerely

Jacqueline MoFarlane

Product Manager (34)

Regulatory Management Branch II Antimicrobials Division (7510P)

Cupron Cuprous Oxide

ACTIVE INGREDIENT

Cuprous Oxide Other Ingredients

97 15% 2 85%

TOTAL

100 0%

KEEP OUT OF REACH OF CHILDREN

> EPA Reg No 84542-3 EPA EST NO

FIRST AID

IF IN EYES Hold eye open and rinse slowly and gently with water for 15-20 minutes Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye Call a poison control center or doctor for treatment advice

IN ON SKIN OR CLOTHING Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minutes Call a poison control center or doctor for treatment advice

IF INHALED Move person to fresh air If not breathing, call 911 or an ambulance then give artificial respiration, preferable mouth to mouth if possible Call a poison control center or doctor for further treatment advice

IF SWALLOWED Call a poison control center or doctor immediately for treatment advice Have person sip a glass of water if able to swallow Do not induce vomiting unless told to do so by a poison control center or doctor Do not give anything by mouth to an unconscious person

Have the product container or label with you when calling a poison control center or doctor, or going for treatment

ACCEPTED
with COMMENTS
FEPA Letter Dated

JUL 19 2012

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

September 21, 2011

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS WARNING

Causes eye, skin and upper respiratory tract irritation. Harmful if swallowed, causes gastrointestinal tract irritation. Copper metal may cause fume fever. Wear goggles or face shield, rubber gloves and an appropriate dust respirator (MSHA/NIOSH approval number prefix TC-21C) when handling. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife Do not apply directly to water, or to areas where surface water is present or to inter-tidal areas below the mean high water mark Runoff may be hazardous to aquatic organisms in neighboring areas Do not contaminate water when disposing of equipment wash waters

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling Cupron Cuprous Oxide is a bacteristatic and fungistatic powder for manufacturing use. The powder is to be incorporated into synthetic fibers during the manufacturing process of a masterbatch. The fibers are used in the manufacturing process of materials incorporated into final articles. Cupron Cuprous Oxide provides bacteristatic and fungistatic protection to the final articles identified on this label. Manufactured products using Cupron Cuprous Oxide may not make any public health claims relating to antimicrobial activity without first obtaining an EPA registration for the manufactured product.

IMPORTANT' Read precautionary statements before using this product

This product is for use in materials that are incorporated into manufactured products listed below

Fibers The final article is to contain from 0.2% to 50.0% Cupron Cuprous Oxide by weight
Household items, bedding, mattress cover pads and filling, pillow covers, sheets, blankets, fiberfill for
quilts and pillows, table cloths, napkins, wiping cloths, mops, towels, vacuum cleaner bags, cushion pads,
sleeping bags, brush bristles, air and dust filters, book covers, curtains, draperies, upholstery, wall
covering fabrics, carpet underlay, carpet backing, conveyor belts that do not come in contact with any
type of food, automotive and truck upholstery, automotive and truck carpeting, truck liners, convertible
tops and interior liners, Apparel, outerwear, uniforms, coats, aprons, sportswear, sleepwear, stockings,
socks, hosiery, caps, undergarments (undershirts, underwear, bras, thermal underwear), inner liners for
jackets, shoes, gloves and helmets, sails, ropes, tents, tarps, canvas, ducking, awnings, umbrellas, outdoor
upholstery, pool covers, boat covers, RV and auto covers

Floor coverings The final article is to contain 0 2%-50 0% Cupron Cuprous Oxide by weight Carpets, rugs, mats, indoor/outdoor carpet and broadloom and tile carpeting

Plastics, coatings, films and laminates The final article (or finished coating) is to contain from 0.2% to 50.0% Cupron Cuprous Oxide by weight Automotive and vehicular parts, brush handles, building materials and components, wood and non-food contact plastic composites, collection and, concrete, conveyor belts that do not come in contact with any type of food, countertops, floor covering, flooring, footwear including boots, furniture, gaskets, glazing for cement tile, and for toilets, countertops, indoor and outdoor furniture, insulation for wire and cable, insulators, kitchen and bathroom hardware, liners, mats, mops, natural and synthetic fibers and fabrics, non-woven fabrics,, plumbing supplies and fixtures, shower curtains, siding, sinks, sports equipment, tape, tiles, tubing, vacuum cleaner bags, wallboard, walls, waste containers, protective coverings for pools and hot tubs. For coatings used on the inside of fire system sprinkler pipes. Personal hygiene devices such as combs, brushes, hairclips.

Adhesives and sealants The final article is to contain from 0.2% to 50.0% Cupron Cuprous Oxide by weight Adhesives used in the manufacturing of wood and plastic composites, adhesives for ceramic tile, rubber, plastic, glazing for windows, grout, sealants for pipes, and adhesives for plumbing

STORAGE AND DISPOSAL

PESTICIDE STORAGE Store in safe manner Store in original container only Store in cool, dry place Storing product at temperatures below -30 °F and above 200 °F is not recommended. Keep container tightly closed when not in use. Reduce stacking height where local conditions, such as humidity or pallet overhang, can affect package strength. Do not store under conditions which might adversely affect the container or its ability to function properly. Such conditions include, but are not limited to, positioning of the container in storage, storage temperature, potential for crushing or damage due to stacking, and penetration of moisture.

PESTICIDE DISPOSAL Pesticide wastes are acutely hazardous Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Open dumping is prohibited

CONTAINER DISPOSAL Non-refillable container Do not reuse or refill this container Clean container promptly after emptying Triple rinse as follow Empty the remaining contents into application equipment or a mix tank Fill the container ¼ full with water and recap Shake for 10 seconds Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal Drain for 10 seconds after the flow begins to drip Repeat this procedure two more times Offer for recycling if possible If recycling is not possible, dispose of empty container in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning If burned, stay out of smoke

WARRANTY

It is impossible to eliminate all risks inherently associated with the use of this product. All such risks shall be assumed by the buyer. Except as expressly provided herein, the manufacturer or seller makes no warranties, guarantees, or representations of any kind, either express or implied, or by usage of trade, statutory or otherwise with regard to the product sold, including but not limited to merchantability, fitness for a particular purpose, use or eligibility of the product for any particular trade usage.

Manufactured by Cupron Technologies P O Box 85073 Richmond VA 23285 1-800-858-7378 Net Contents XXX