

84542-11

5/15/2014

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

MAY 15 2014

Dr. Matthew Brooks
Cupron Technologies
c/o Ag-Chem Consulting
12208 Qunique Lane
Clifton, VA 20124

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: **Cupron Anti-Fungal Fibers and Fabrics III**
EPA Registration Number: 84542-11
Application Date: February 19, 2014
Receipt Date: February 20, 2014

Dear Dr. Brooks:

The following amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide (FIFRA), as amended, is acceptable.

Proposed Amendment

- Split current label into two sublabels and adding Jock itch Claim

Label Deficiencies

A stamped label is enclosed for your records. This labeling supersedes all previous labeling. The next printing of this product must use this labeling unless subsequent changes have been approved. You must submit one copy of the final printed label before selling or distributing the product bearing the revised labeling. In accordance with 40 CFR 152.130©, you must distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling, or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and it's implementing regulations at 40 CFR 152.3.

General Comments

If you have further questions concerning this letter, then please contact me by telephone at (703) 308-6416 or by e-mail at hardy.jacqueline@epa.gov or Stacey Grigsby by telephone at (703) 308-6440 or by email at grigsby.stacey@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,

Stacey Grigsby
 f1 Jacqueline Hardy
 Product Manager 34
 Regulatory Management Branch II
 Antimicrobials Division (7510P)

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Master Label containing Sublabel 1. Athlete's Foot Label Sublabel 2. Jock Itch Label

[Sublabel 1: Athlete's Foot Label]

CUPRON ANTI-FUNGAL FIBERS AND FABRICS III

[Additional Brand Name: Cupron AntiFungal Fibers]

Active Ingredient	
Copper (I) oxide	1.95 %
Other Ingredients (Garment)	98.05 %
Total	100.00 %

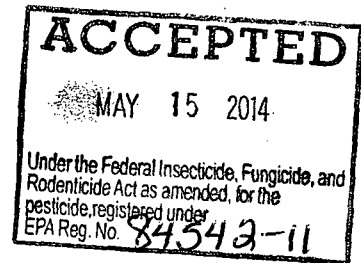
EPA Registration No. 84542- 11

EPA Establishment No *****

Made in the United States by Cupron Inc, Richmond, VA 23219

Distributed by*****

Net Contents*****



Cupron Anti Fungal Fibers and Fabrics III

Cupron Anti Fungal Fibers and Fabrics III

[When Additional Brand Name is used the statement Cupron enhanced fibers/fabric shown below is replaced with Cupron AntiFungal Fibers]

-THIS TEXTILE (OR IDENTIFIED ACTIVE AREA) CONTAINS CUPRON ANTI-MICROBIAL TECHNOLOGY

Laboratory testing has shown that when cleaned regularly:

Cupron enhanced fibers/fabric will assist in reducing the spread of *T. mentagrophytes* (athlete's foot fungus).

Cupron enhanced fibers/fabric will [reduce, inhibit, suppress, kill] 99.9% of *T. mentagrophytes* (athlete's foot fungus) after 12 hours of contact with [sock, bathmats, shoe inserts].

Cupron enhanced fibers / fabric will inhibit the propagation and harboring of *T. mentagrophytes* on the [socks, bathmats, shoe inserts].

Cupron enhanced fibers / fabric will help to inhibit the growth of *T. mentagrophytes* the causative agent of athlete's foot on the [socks, bathmats, shoe inserts].

Cupron enhanced fibers / fabric will help to suppress the growth of *T. mentagrophytes* the fungus that is the causative agent of athlete's foot on the [socks, bathmats, shoe inserts].

Cupron enhanced fibers/fabric will [reduce, inhibit, suppress, kill] 99.9% of the *T. mentagrophytes* (athlete's foot fungus) on the [socks, bathmats, shoe inserts].

Cupron enhanced fibers / fabric will inhibit the growth of athlete's foot fungus on the [socks, bathmats, shoe inserts].

Cupron enhanced fibers/fabric reduce(s) the spread of *T. mentagrophytes*, athlete's foot fungus, on the surface of the sock.

Cupron enhanced fibers/fabric prevent(s) the growth of 99.9% of *T. mentagrophytes*, athlete's foot fungus, on the sock.

Cupron enhanced fibers / fabric will [reduce, inhibit, suppress, kill] 99.9% of *T. mentagrophytes*, athlete's foot fungus, on the [sock, bathmat, shoe inserts].

Cupron enhanced fibers/fabric significantly reduce(s) 99.9% of *T. mentagrophytes*, fungus that causes athlete's foot on the sock.

THIS PRODUCT IS EFFICACIOUS UP TO 20 MACHINE WASHINGS

The use of this textile 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 sanitizing/disinfection of textiles. This textile has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

Cupron Anti Fungal Fibers and Fabrics III

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 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]

This product will retain its antimicrobial properties for 20 washings if maintained in the following manner:

Machine Wash Regular (not compatible with silvercare machines)

Temperature Cold, Warm, or Hot (up to 176 degrees Fahrenheit)

Tumble dry hot (up to 347 degrees Fahrenheit) for up to 30 minutes

May use Clorox or similar bleach

Do not use fabric softener, or laundry detergent containing fabric softeners

Do not dry clean.

[Cupron Anti Fungal Fibers and Fabrics III may be used in public, commercial and residential buildings for the uses listed below.]

TEXTILES ARE TO BE USED TO MAKE SOCKS, FOOTWEAR, SHOE INSERTS AND BATHMATS.

STORAGE AND DISPOSAL

Disposal: Discard in trash when fibers/fabric are worn out or after 20 washings. Do not reuse clothing for other purposes than as sold.

Hang Tag Label:



Cupron AntiFungal Fibers

Cupron Antifungal Fibers Kill 99.9% of T. mentagrophytes (athlete's foot fungus) after 12 hours of contact with socks.

Active Ingredient

Copper (I) Oxide	1.95%
Other Ingredients (Garment)	98.05%
Total	100%

EPA Registration No 84542-11

EPA Establishment No 3541-TN-001, 3541-AL-001

Manufactured for
Cupron Inc
Suite 123, 800 East Leigh Street, Richmond, VA 23219

DIRECTIONS FOR USE

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

This product will retain its antimicrobial properties for 20 washings if maintained in the following manner:

- Machine Wash Regular
- Temperature Cold, Warm, or Hot (up to 176 degrees Fahrenheit)
- Tumble dry hot (up to 347 degrees Fahrenheit) for up to 30 minutes
- May use Clorox or similar bleach
- Do not use fabric softener, or laundry detergent containing fabric softeners
- Do not dry clean.

Storage and Disposal

Discard in trash when fibers/fabric are worn out or after 20 washings. Do not reuse clothing for other purposes than as sold.

The use of this textile 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 sanitizing/disinfection of textiles. This textile has been shown to reduce microbial contamination, but it does not prevent cross contamination.

Master Label containing
Sublabel 1. Athlete's Foot Label
Sublabel 2. Jock Itch Label

[Sublabel 2: Jock Itch Label]

CUPRON ANTI-FUNGAL FIBERS AND FABRICS III

[Additional Brand Name: Cupron AntiFungal Fibers]

Active Ingredient	
Copper (I) oxide	1.95%
Other Ingredients (Garment)	98.05%
Total:	100.00%

EPA Registration No. 84542- 11

EPA Establishment No *****

Made in the United States by Cupron Inc, Richmond, VA 23219

Distributed by*****

Net Contents*****

Cupron AntiFungal Fibers and Fabrics III

-THIS TEXTILE (OR IDENTIFIED ACTIVE AREA) CONTAINS CUPRON ANTI-MICROBIAL TECHNOLOGY

Laboratory testing has shown that when cleaned regularly:

- Cupron enhanced fibers / fabric will assist in reducing the spread of *T. mentagrophytes* (jock itch fungus)
- Cupron enhanced fibers / fabric will [reduce, inhibit, suppress, kill] 99.9% of *T. mentagrophytes* (jock itch fungus) after 12 hours of contact with the [USE SITE]
- Cupron enhanced fibers / fabric will inhibit the propagation and harboring of *T. mentagrophytes* on [USE SITE]
- Cupron enhanced fibers / fabric will help to inhibit the growth of *T. mentagrophytes* the causative agent of jock itch on [USE SITE]
- Cupron enhanced fibers / fabric will help to suppress the growth of *T. mentagrophytes* the fungus that is the causative agent of jock itch on [USE SITE]
- Cupron enhanced fibers / fabric will [reduce, inhibit, suppress, kill] 99.9% of the *T. mentagrophytes* (jock itch fungus) on the [USE SITE]
- Cupron enhanced fibers / fabric will inhibit the growth of *T. mentagrophytes*, jock itch fungus, on [USE SITE]
- Cupron enhanced fibers / fabric reduce(s) the spread of *T. mentagrophytes*, jock itch fungus, on the surface of the [USE SITE]
- Cupron enhanced fibers / fabric prevent(s) the growth of 99.9% of *T. mentagrophytes*, jock itch fungus, on the [USE SITE]
- Cupron enhanced fibers / fabric will [reduce, inhibit, suppress, kill] 99.9% of *T. mentagrophytes*, jock itch fungus, on the [USE SITE]
- Cupron enhanced fibers / fabric significantly reduce(s) 99.9% of *T. mentagrophytes*, the fungus that causes jock itch on the [USE SITE]

THIS PRODUCT IS EFFICACIOUS UP TO 20 MACHINE WASHINGS

The use of this textile 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 sanitizing/disinfection of textiles. This textile has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

DIRECTIONS FOR USE

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[The directions in bracketed text 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]

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Machine Wash Regular (not compatible with silvercare machines)

Temperature Cold, Warm, or Hot (up to 176 degrees Fahrenheit)

Tumble dry hot (up to 347 degrees Fahrenheit) for up to 30 minutes

May use Clorox or similar bleach

Do not use fabric softener, or laundry detergent containing fabric softeners

Do not dry clean.

[Cupron Anti Fungal Fibers and Fabrics III may be used in various public, commercial and residential buildings for the uses listed below.]

TEXTILES ARE TO BE USED TO MAKE:-underwear, studio apparel (pants, capris, shorts, leggings, tights), yoga apparel (pants, capris, shorts, leggings, tights), run apparel (pants, capris, shorts, leggings, tights), training apparel (pants, capris, shorts, leggings, tights), team sports apparel (pants, capris, shorts, leggings, tights), team sports uniforms (pants, capris, shorts, leggings, tights), baselayer (pants, capris, shorts, leggings, tights), compression products (pants, capris, shorts, leggings, tights), warmth layers (pants, capris, shorts, leggings, tights), leg sleeves.

STORAGE AND DISPOSAL

Disposal: Discard in trash when fibers/fabric are worn out after 20 washings. Do not reuse clothing for other purposes than as sold.

Hang Tag Label:



Cupron AntiFungal Fibers

Cupron Antifungal Fibers Kill 99.9% of T. mentagrophytes (jock itch fungus) after 12 hours of contact with (insert site).

Active Ingredient

Copper (I) Oxide	1.95%
Other Ingredients (Garment)	98.05%
Total	100%

EPA Registration No 84542-11

EPA Establishment No 3541-TN-001, 3541-AL-001

Manufactured for
Cupron Inc
Suite 123, 800 East Leigh Street, Richmond, VA 23219

DIRECTIONS FOR USE

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This product will retain its antimicrobial properties for 20 washings if maintained in the following manner:

- Machine Wash Regular
- Temperature Cold, Warm, or Hot (up to 176 degrees Fahrenheit)
- Tumble dry hot (up to 347 degrees Fahrenheit) for up to 30 minutes
- May use Clorox or similar bleach
- Do not use fabric softener, or laundry detergent containing fabric softeners
- Do not dry clean.

Storage and Disposal

Discard in trash when fibers/fabric are worn out or after 20 washings. Do not reuse clothing for other purposes than as sold.

The use of this textile 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 sanitizing/disinfection of textiles. This textile has been shown to reduce microbial contamination, but it does not prevent cross contamination.