

85290-4

09/20/2012

1/13



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D C 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

SEP 20 2012

Mr Rich Pratt  
Director of Marketing for,  
PMX Industries, Inc  
5300 Willow Creek Drive  
Cedar Rapids, IA 52404

Mail to Mr Micah T Reynolds  
1150 18<sup>th</sup> Street, NW, Suite 1000  
Washington, D C 20036

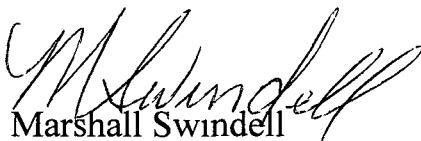
Subject MicroGuard IV  
EPA Registration Number 85290-4  
Your Notification Dated August 20, 2012  
EPA Received Date August 21, 2012

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add an optional marketing logo for use on the copper alloy product labeling and/or fabricator product labeling, is acceptable

The notification has been made part of the permanent file

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)

313

	United States <b>Environmental Protection Agency</b> Washington DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide – Section I**

1 Company/Product Number <p style="text-align: center;"><b>85290-4</b></p>	2 EPA Product Manager <p style="text-align: center;"><b>Marshall Swindell</b></p>	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4 Company/Product (Name) <p><b>MicroGuard IV</b></p>	PM# <p style="text-align: center;"><b>33</b></p>	
5 Name And Address Of Applicant (Include ZIP Code) <p><b>PMX Industries, Inc</b>  <b>5300 Willow Creek Drive, SW</b>  <b>Cedar Rapids, Iowa 52404</b></p> <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"/> 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 checked="" type="checkbox"/> Notification – Explain below	<input type="checkbox"/> Other – Explain Below

**Explanation** Use additional page(s) if necessary (For section I and Section II )

**Submission of Label Notification to add marketing logo**

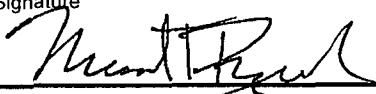
This notification is consistent with the provisions of PR Notice 98 10 and EPA regulations at 40 CFR 152 46 and no other changes have been made to the labeling or the confidential statement of formula of this product I understand that it is a violation of 18 U S C Sec 1001 to willfully make any false statement to EPA I further understand that if this notification is not consistent with the terms of PR Notice 98 10 and 40 CFR 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

**Please confirm receipt with Micah Reynolds [mreynolds@tsgusa.com](mailto:mreynolds@tsgusa.com), phone (202) 828-8967, or fax (202) 872 0745**

**Section III**

1 Material This Product Will Be Packaged In					
Child Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2 Type of Container		
* Certification must be submitted			<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	If Yes      No per Unit Packaging wgt      Container	If Yes      No per Unit Packaging wgt      Container
3 Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4 Size(S) Retail Container		5 Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6 Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

**Section IV**

1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application )		
Name <b>Micah T Reynolds Technology Sciences Group Inc</b>	Title <b>Regulatory Consultant</b>	Telephone No (Include Area Code) <b>(202) 828 8967</b>
Certification 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 <b>(Stamped)</b>
2 Signature 		
3 Title <b>Regulatory Consultant to PMX Industries, Inc</b>		
4 Typed Name <b>Micah T Reynolds</b>		5 Date <b>August 20, 2012</b>



**Technology Sciences Group Inc**  
1150 18<sup>th</sup> Street Suite 1000  
Washington DC 20036  
Direct (202) 828 8967  
Fax (202) 872 0745  
E Mail MReynolds@TSGUSA.com

**Micah T Reynolds**  
Regulatory Consultant

August 20 2012

**PMX Industries, Inc**  
**Label Notification for MicroGuard IV,**  
**EPA Reg No 85290-4**

Mr Marshall Swindell PM-33  
Antimicrobials Division (7504P)  
Office of Pesticide Programs  
U S Environmental Protection Agency  
Document Processing Center  
Room S-4900 One Potomac Yard  
2777 South Crystal Drive  
Arlington Virginia 22202

Dear Mr Swindell

Technology Sciences Group Inc on behalf of PMX Industries Inc is submitting the enclosed label notification to add an optional marketing logo for use on the copper alloy product label and/or the fabricated product label. Conventionally a redline version of the revised label (showing changes made) would be provided however since only the logo has been added (creating a ninth page of the label) with no other changes a redline label was not produced. Please find enclosed the following documents supporting this notification.

- 1) Application for Notification (EPA Form 8570-1)
- 2) Three (3) copies of revised product labeling

If you have any questions or require additional information or clarification please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at [mreynolds@tsgusa.com](mailto:mreynolds@tsgusa.com)

Sincerely

Regulatory Consultant to  
PMX Industries Inc

Enclosures

CC R Pratt (PMX Industries Inc)

5/13

MicroGuard IV  
AND ASSOCIATED FABRICATED PRODUCTS  
MASTER LABEL

The Master Label consists of the label that will accompany the MicroGuard IV Antimicrobial Alloys and a label that will accompany each product fabricated using a registered MicroGuard IV alloy

[Alloy Label – Front Panel]

MicroGuard IV  
AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient		
Copper		73.0%
Other		27.0%
Total		100%

EPA Registration No 85290-4  
EPA Establishment No 85290-XX

Made in the United States by  
PMX Industries Inc  
5300 Willow Creek Drive SW Cedar Rapids IA 52404

Net Weight XXX lbs XXX ounces of MicroGuard IV

NOTIFICATION  
Date Reviewed 9/20/12  
Reviewed By [Signature]

## DIRECTIONS FOR USE

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

### MicroGuard IV Antimicrobial Copper Alloys

These alloys are only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, 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 MicroGuard IV Antimicrobial Copper Alloys and fabricated products made from MicroGuard IV Antimicrobial Copper Alloys under EPA Registration Number 85290-4

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

NOTIFICATION  
Date Reviewed 7/25/12  
Reviewed By L. Long

7/13

- 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

NOTIFICATION  
Date Reviewed 9/20/12  
Reviewed By E. L. O'Neil

- 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
- 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

***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
- 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)

NOTIFICATION  
Date Reviewed 9/20/12  
Reviewed By HC Leary

- 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
- 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)

***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

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

NOTIFICATION  
Date Reviewed 9/2/12  
Reviewed By R. Lenny

11/13

MicroGuard IV – Fabricated Products

The MicroGuard IV fabricated products listed above may be sold and distributed under EPA Registration Number 85290-4 Products fabricated with MicroGuard IV Antimicrobial Copper Alloys 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

NOTIFICATION  
Date Reviewed 9/30/12  
Reviewed By FELONY

12/13

MicroGuard IV  
Fabricated Product Label

FRONT

[This (touch surface) (product)] made from  
**MicroGuard 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  
 MicroGuard IV

BACK

**MicroGuard 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) Escherchia 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 85290-4                   EPA Est No [Product Manufacturer Number] 85290 XX]  
 Manufactured by [Product Manufacturer Company Name and Address]  
 PMX Industres Inc 5300 Willow Creek Drive SW Cedar Rapids IA 52404

NOTIFICATION  
 Date Reviewed 2/20/12  
 Reviewed By E. Leary

