

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SEP 2 0 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 18th Street, NW, Suite 1000

Washington, D.C. 20036

Subject: MicroGuard V

EPA Registration Number 85290-5

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,

Product Manager 33

Regulatory Management Branch I Antimicrobial Division(7510P)

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98 Please read instructions on reverse side before completing form OPP Identifier Number **United States** Registration Environmental Protection Agency **Amendment** Washington, DC 20460 Other Application for Pesticide – Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification 85290-5 Marshall Swindell None Restricted 4. Company/Product (Name) PM# 33 MicroGuard V 5. Name And Address Of Applicant (Include ZIP Code) 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling PMX Industries, Inc. 5300 Willow Creek Drive, SW EPA Reg. No. Cedar Rapids, Iowa 52404 Product Name Check if this is a new address Section II Final Printed labels in response to Amendment – Explain below. Agency letter dated ___ Resubmission in response to Agency letter dated _____ "Me Too" Application. Notification – Explain below. 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, phone (202) 828-8967, or fax (202) 872-0745. Section III 1. Material This Product Will Be Packaged In: Water Soluble Packaging Child Resistant Packaging Unit Packaging 2. Type of Container Yes* Yes Yes Metal Plastic No No Glass * Certification must If "Yes" If "Yes" No. per No. per Paper be submitted Unit Packaging wgt. Unit Packaging wgt. Container Container Other (Specify) 3. Location of Net Contents Information 4. Size(S) Retail Container 5. Location of Label Directions On Label Label Container On Labeling accompanying product Lithographed 6. Manner in Which Label is Affixed to Product Other ____ Pager glued Stenciled Section IV 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Title Telephone No. (Include Area Code) (202) 828-8967 Micah T. Reynolds, Technology Sciences Group, Inc. **Regulatory Consultant** Certification 6 Date Application Received 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 (Stamped) both under applicable law. 2. Signature Regulatory Consultant to PMX Industries; ca

Inc.

August 20, 2012

Micah T. Reynolds

4. Typed Name



Technology Sciences Group Inc.

1150 18th 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 V; EPA Reg. No. 85290-5

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.

Sincerely,

Regulatory Consultant to PMX Industries, Inc.

Enclosures

CC: R. Pratt (PMX Industries, Inc.)

Phone: (530) 757-1245

A Reg. No. 85290-5) Master Label version dated August 13, 2012

MicroGuard V AND ASSOCIATED FABRICATED PRODUCTS MASTER LABEL

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

[Alloy Label – Front Panel]

MicroGuard V AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient:

Copper

66.5%

Other

33.5%

Total

100%

EPA Registration No. 85290-5 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 V

DIRECTIONS FOR USE

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

MicroGuard V 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 V Antimicrobial Copper Alloys and fabricated products made from MicroGuard V Antimicrobial Copper Alloys under EPA Registration Number 85290-5.

A list of components that may be fabricated out of MicroGuard V Antimicrobial Copper Alloys is specified below. MicroGuard V Antimicrobial Copper Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- o Bedrails, footboards
- 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
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- o Bedrails, assistance rails,
- o Toilet safety rails
- o Carts

Hospital carts (table surfaces, handles, legs)

Computer carts

Record carts

Phlebotomy carts

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

Date Reviewed: 1991.3

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- Towel bars
- 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
- 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
- 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

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

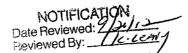
- o Intravenous (IV) poles, bases, hangers, clips
- o Trays (instruments, non-food contact)
- o Pans (bed)
- o Walkers, wheelchair handles, and tubular components
- o Computer keyboards: keys, housings, computer mouse surfaces
- o Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- o Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- o Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted ving facilities etc. Components can include bases, arms, housings, handles, hinges)
- o Headwall systems: the unit themselves, outlet covers, knobs and diais, lighting in units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

Date Reviewed: 45. Cory

- o Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- o Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- o Medical records: Chart holders, clipboards, filing systems
- o Storage Shelving: wire shelving etc. for medical supplies
- o Grab handles on privacy curtains
- o Lids of laundry hampers, trash canisters, and other containers
- o Bedside pitchers
- Closet rods and hangers
- o Television controls: knobs, buttons, remote
- o Monitor (television, computer, etc.) housing
- o Cup Holder
- o Toothbrush holder
- o Soap holder
- o Magazine rack
- o Signage
- Coat rack and hooks
- o Shower curtain rings
- Radiator cover
- o Bracelets
- o Pens
- o Badge clips
- o Name tags
- o Patient gown snaps
- o Window sills, pulls and locks
- o Electrical wallplates

Community Facilities (including various public and commercial buildings)

- o Shopping cart handles, child seats, handrails
- o Cash registers: housing, keypads
- o ATM machines: keys, housing
- o Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- o Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- o Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- o Soap dispenser (wall mounted): push bar and dispenser itself
- o Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- 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 Light switches, switch plates



- o Lids of laundry hampers, trash canisters, and other containers
- o Magazine rack
- o Signage
- Coat rack and hooks
- o Shower curtain rings
- o Radiator cover
- o Bracelets
- o Badge clips
- o Name tags
- Vending machines (non-food contact only)
- Window sills
- o Electrical wallplates
- o Clip boards
- o 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)
- o Bedrails, footboards
- o Handrails
- o Stair rails
- 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
- Towel bars
- o Showerheads
- 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
- Floor tiles
- o Ceiling tiles (non-porous)
- 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 Bedside pitchers
- o Closet rods and hangers
- o Television remote
- o Cup Holder
- o Toothbrush holder
- o Soap holder
- o Magazine rack
- Coat rack and hooks
- o Shower curtain rings
- Radiator cover
- Window sills
- o Electrical wallplates
- o Baby cribs: rails, fittings, brackets, supports
- o Bowl stands
- o Office supplies: paper clips, staplers, tape dispensers
- o Monitor (television, computer, etc.) housing

Mass Transit Facilities

- 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
- 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
- Chapel pews
- o Eye glass frames and protective eye wear
- o Pens
- o Combs
- Ashtrays

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

NOTIFICATION
Date Reviewed: 7/40/12
Reviewed By: Lavary

MicroGuard V A Reg. No. 85290-5) Master Label version dated August 13, 2012

MicroGuard V - Fabricated Products

The MicroGuard V fabricated products listed above may be sold and distributed under EPA Registration Number 85290-5. Products fabricated with MicroGuard V 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: 4/3/13
Peviewed By: 4: CENTLY

MicroGuard V A Reg. No. 85290-5) Master Label version dated August 13, 2012

MicroGuard V Fabricated Product Label

FRONT

 $\begin{tabular}{ll} [This (touch surface) (product)] made from \\ MicroGuard \ V \end{tabular}$

Active Ingredient:

See [Back/Side Panel][Insert] for Directions for

Use

Net Weight: XXX lbs XXX ounces of

MicroGuard V

BACK

MicroGuard V

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. 85290-5 EPA Est. No. [Product Manufacture] Number] 85290 XX]
Manufactured by: [Product Manufacturer Company Name and Address]
PMX Industries, Inc., 5300 Willow Creek Drive SW, Cedar Rapids, IA 52404

NOTIFICATION
Date Reviewed: 2/2/13
Sviewed By: 4.2974

MicroGuard V (EPA Reg. No. 85290-5) Master Label version dated August 13, 2012

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

Antimicrobial Copper

