

85340-1

8/22/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D C 20460

AUG 22 2012

OFFICE OF
PREVENTION PESTICIDES
AND TOXIC SUBSTANCES

Mr Micah Reynolds
Registration Agent for
c/o Cerro Flow Products LLC
Technology Sciences Group Inc
1150 18th Street N W
Suite 1000
Washington D C 20036

Subject Cerro Flow Products
EPA Registration Number 85340 1
Your Amendment Dated May 23 2012
EPA Received Date May 24 2012

The amendment referred to above submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act FIFRA as amended to update the product labeling to align with the most current referenced product labeling from the Copper Development Association (EPA Reg No 82012 4) and correct the ai statement in the fabricated hang tag to match with the alloy labeling is acceptable

A stamped copy of the product labeling is enclosed

If you have any questions concerning this letter please contact Karen M Leavy at (703) 308 6237

Sincerely

A handwritten signature in black ink that reads "M Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division (7510P)

Cerro Flow Products
AND ASSOCIATED FABRICATED PRODUCTS
MASTER LABEL

The Master Label consists of the label that will accompany the Cerro Flow Products Antimicrobial Alloys and a label that will accompany each product fabricated using a registered alloy from Cerro Flow Products alloy

[Alloy Label – Front Panel]

Cerro Flow Products
AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient	
Copper	96.2%
Other	3.8%
 Total	 100%

EPA Registration No 85340 1
EPA Establishment No 85340 XX XXX

Made in the United States by
Cerro Flow Products LLC
P O Box 66800
St Louis MO 63166

Net Weight XXX lbs XXX ounces of Cerro Flow Products

ACCEPTED
with COMMENTS
in EPA Letter Dated
AUG 22 2012

Under the Federal Insecticide
Fungicide and Rodenticide Act as
amended for the pesticide
registered under EPA Reg No 85340-1

DIRECTIONS FOR USE

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

Cerro Flow Products

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 Cerro Flow Products and fabricated products made from Cerro Flow Products under EPA Registration Number 85340 1]

A list of components that may be fabricated out of Cerro Flow Products is specified below
Cerro Flow Products 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 in this)
- 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

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- 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
- Critical care cart Table top drawer drawer pull lock copper wire basket for storage of equipment and charts

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- 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

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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

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)
- Casement (cranks levers hinges)
- Single and double hung windows (locks and pulls)

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- 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

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Cerro Flow Products – Fabricated Products

The Cerro Flow Products fabricated products listed above may be sold and distributed under EPA Registration Number 85340 1 Products fabricated with Cerro Flow Products 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

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Cerro Flow Products
Fabricated Product Label

FRONT

[This (touch surface) (product)] made from

Cerro Flow Products

Active Ingredient
 Copper 96.2 /
 Other 3.8 /
 [Total 100.0 /]
 See [Back/Side Panel][Insert] for Directions for Use
 Net Weight XXX lbs XXX ounces of Cerro Flow Products

BACK

Cerro Flow Products

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

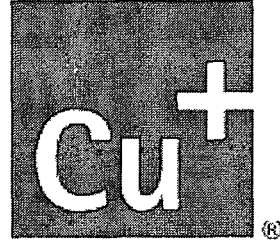
If used as intended this product is wear resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed

EPA Reg N 85340 1 EPA E T N [Product Name] 853-0 XX
 XXX
 M f t d by [Product Name] C m p y N m d Add]
 C F l w P o d t P O B 66800 St L MO 63166

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

Antimicrobial
Copper



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