

85341-2

03/11/2011

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 11 2011

Mr. Micah T. Reynolds
Regulatory Consultant for,
c/o Revere Copper Products, Inc.
TSG, Inc.
1150 15th Street, N.W.
Suite 1000
Washington, D.C. 20036

Subject: Revere Antimicrobial Brass™
EPA Registration Number 85341-2
Your Amendment Dated February 23rd, 2011
EPA Received Date February 23rd, 2011

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 comply with the wording negotiated between the Copper Development Association(CDA) and EPA, and to add several alloys, is acceptable subject to the comments listed below:

- 1) The fabricator cannot make claims about the basic copper alloy product or ingredient or Fabricated article (doorknob, handrail, etc.) that conflict with statements required pursuant to FIFRA on either the basic copper alloy product or any fabricated product label. For example, the accepted master label for the basic copper alloy as well as the label for the fabricated product that is included within the master label state "Normal tarnishing or wear of the surface will not impair antibacterial effectiveness." Additionally, in support of your application for registration of the basic copper alloy products, you submitted data supporting your position that tarnish has be beneficial impact on product efficacy against target microorganisms. Hence, the warranty statement, for example, on either the basic copper alloy product or any fabricated product cannot make a non-tarnish claim as that would conflict with the above required label statement.

- 2) The EPA Establishment Number that appears on the labeling for the alloy product labeling and/or the labeling for the fabricated end-use article to being sold or distributed must be that of the establishment where the particular product it is being produced and labeled. For the alloy product, it would be the establishment where the alloy product is produced and labeled. For the fabricated end-use article, it would be the establishment where the fabricated end-use article is produced and labeled. It is the responsibility of the owner of the establishment where the final production takes place to report production, and to maintain books and records under FIFRA Sections 7 and 8 and 40 CFR 167 and 169.

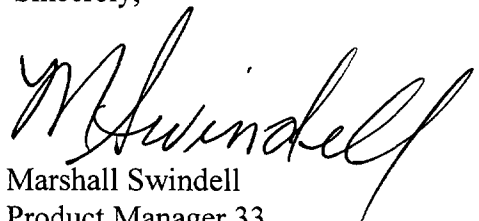
- 3) The labels attached to the copper alloy and the end-use fabricated products must contain the name and address of the producer, registrant, or person for whom produced in accordance with 40 CFR 156.10 (c).

The revised Confidential Statement of Formula dated February 22nd, 2011, is acceptable.

A stamped copy of the labeling is enclosed for your records.

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)

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Revere Antimicrobial Brass™ AND ASSOCIATED FABRICATED PRODUCTS MASTER LABEL

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

[Alloy Label – Front Panel]

Revere Antimicrobial Brass™ AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient:

Copper	73.0%
Other	27.0%
 Total	 100%

EPA Registration No. 85341-2
EPA Establishment No. 85341-NY-001

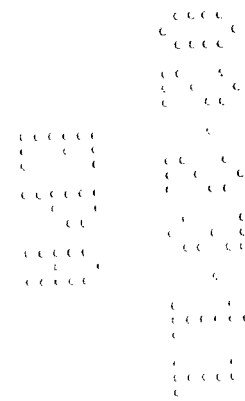
Made in the United States by:
Revere Copper Products, Inc.
One Revere Park
Rome, New York 13440

Net Weight: XXX lbs XXX ounces of Revere Antimicrobial Brass™

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with COMMENTS
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Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85341-2



DIRECTIONS FOR USE

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

Revere Antimicrobial Brass™ 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 Revere Antimicrobial Brass™ Antimicrobial Copper Alloys and fabricated products made from Revere Antimicrobial Brass™ Antimicrobial Copper Alloys under EPA Registration Number 85341-2.

A list of components that may be fabricated out of Revere Antimicrobial Brass™ Antimicrobial Copper Alloys is specified below. Revere Antimicrobial Brass™ 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 & elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts

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- Hospital carts (table surfaces, handles, legs)
- Computer carts
- Record carts
- Phlebotomy carts

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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

- 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

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Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

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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

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- 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

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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

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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)
- 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

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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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Revere Antimicrobial Brass™ – Fabricated Products

The Revere Antimicrobial Brass™ fabricated products listed above may be sold and distributed under EPA Registration Number 85341-2. Products fabricated with Revere Antimicrobial Brass™ Antimicrobial Copper Alloys must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

STORAGE AND DISPOSAL

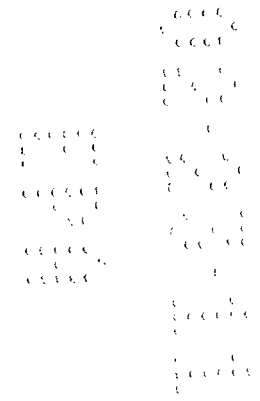
Dispose of excess by recycling.

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.

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Revere Antimicrobial Brass™

Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
Revere Antimicrobial Brass™
Active Ingredient:
Copper73.0%
Other.....27.0%
[Total 100.0%]
See [Back/Side Panel][Insert] for Directions for Use
Net Weight: XXX lbs XXX ounces of Revere Antimicrobial Brass™

BACK

Revere Antimicrobial Brass™

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. 85341-2 EPA Est. No. [Product Manufacturer Name]: 85341-NY-001
Manufactured by: [Product Manufacturer Company Name and Address]
Revere Copper Products, Inc. One Revere Park Rome, New York 13440

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