

85341-2

9/13/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D C 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr T O'Shaughnessy
President for,
Revere Copper Products, Inc
One Revere Park
Rome, NY 13440

SEP 13 2012

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

Subject Revere Antimicrobial BrassTM
EPA Registration Number 85341-2
Your Notification Dated August 15, 2012
EPA Received Date August 17, 2012

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add marketing logo to the product labeling, is acceptable

The notification has been made part of the permanent file


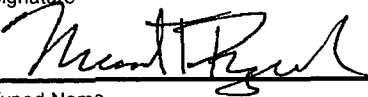
If you have questions concerning this letter, please contact Karen M Leavy
at (703)-308-6237

Sincerely,

A handwritten signature in black ink, appearing to read "M. Swindell". The signature is fluid and cursive, with the first name "Marshall" and last name "Swindell" clearly distinguishable.

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

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 United States Environmental Protection Agency Washington DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1 Company/Product Number 85341 2		2 EPA Product Manager Marshall Swindell	
4 Company/Product (Name) Revere Antimicrobial Brass™		PM# 33	3 Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
5 Name And Address Of Applicant (Include ZIP Code) Revere Copper Products Inc One Revere Park Rome NY 13440 <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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below		<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Me Too Application <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@tsghusa.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 * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes No per Unit Packaging wgt Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes No per Unit Packaging wgt Container	2 Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
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 type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	
Section IV			
1 Contact Point (Complete items directly below for identification of individual to be contacted if necessary to process this application)			
Name Micah T Reynolds Technology Sciences Group Inc		Title Regulatory Consultant	Telephone No (Include Area Code) (202) 828 8967
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 (Stamped)
2 Signature 		3 Title Regulatory Consultant to Revere Copper Products Inc	
4 Typed Name Micah T Reynolds		5 Date August 15 2012	

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Technology Sciences Group Inc

1150 18 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 15 2012

Revere Copper Products Inc
Label Notification for Revere Antimicrobial
Brass™ EPA Reg No 85341 2

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 Revere Copper Products 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
Revere Copper Products Inc

Enclosures

CC T O Shaughnessy (Revere Copper Products Inc)

Washington D C
1150 18 St NW Suite 1000
Washington DC 20036
Phone (202) 223 4392

California
712 Fifth St Suite A
D CA 95616
Phone (530) 757 1245

Canada
275 Slote St Suite 900
Ottawa Ontario K1F 5H9
Phone (613) 247 6285



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™

NOTIFICATION
Date Reviewed 9/13/13
Reviewed By [Signature]

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 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 9/13/12
Reviewed By KZ

- 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 8/13/12
Reviewed By KZ

- 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

NOTIFICATION
Date Reviewed 9/13/13
Reviewed By KZ

- 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 9/13/12
Reviewed By [Signature]

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- 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 7/13/12
By KZ

11/13

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

NOTIFICATION
Date Reviewed 9/13/13
Reviewed By [Signature]

12/13

Revere Antimicrobial Brass™ Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
Revere Antimicrobial Brass™
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 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

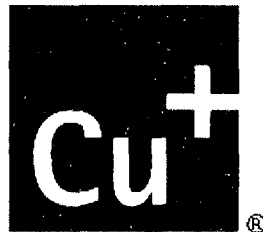
EPA Reg N 85341 2 EPA E t N [P d c t M u f t t r t] 3 341 NY 001
Ma ufa t d by [P d t M f t C mp y N m d Add]
R e e C pp P d c t l c O R e P r k R m N w Y o k 13440

NOTIFICATION
Date Reviewed 11/13/13
Reviewed By KZ

13/13

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

**Antimicrobial
Copper**



NOTIFICATION
Date Reviewed 9/13/12
KJ