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

NOV 6 2009



Office of Pesticide Programs

Globe Brass and Copper Inc.  
427 North Shamrock Street  
East Alton, IL 62024

Attention: Amy Plato Roberts

**Subject: Copper Shield 82**  
EPA Registration No. 85353-3  
Notification Dated October 8, 2009

This will acknowledge receipt of your notification to add the following additional brand name, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

ADDITIONAL BRAND NAME

"CuVerro™ III"

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your product file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

Marshall Swindell  
Product Manager (33)  
Regulatory Management Branch 1  
Antimicrobials Division (7510P)





4/11

[Front panel]

### Copper Shield 82

**Alternate Brand Name: "CuVerro™ III,"**

\*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

**Active Ingredient:**

Copper	82.6% <sup>#</sup>
Other	17.4% <sup>#</sup>

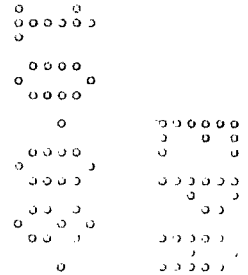
<sup>#</sup> Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

**Total** 100%

EPA Registration No. \*\*\*\*  
EPA Establishment No. \*\*\*\*\*

Made in the United States by \*\*\*\*\*  
Distributed by \*\*\*\*\*

Net Contents: \*\*\*\*\*



[Back panel]

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial\* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria\* within two hours of exposure.]

[This [product] surface delivers continuous and ongoing antibacterial\* action, remaining effective in killing greater than 99.9% of bacteria\* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria\* within two hours, and continues to kill more than 99% of bacteria\* even after repeated contamination.]

[This [product] surface helps inhibit the buildup and growth of bacteria\* within two hours of exposure between routine cleaning and sanitizing steps.]

\* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper 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. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

\* \* \* \* \*

**DIRECTIONS FOR USE**

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

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

**Proper Care and Use of Copper Shield 82: The use of [antimicrobial copper surfaces] [this surface] does not replace standard infection control procedures and good hygienic**

**practices. Surface[s] must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.**

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

**This product must not be waxed, painted, lacquered, varnished, or otherwise coated.**

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

***Healthcare Facilities***

- o Bedrails, footboards
- o 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
- o 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

- 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

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 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

***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

***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

**Other**

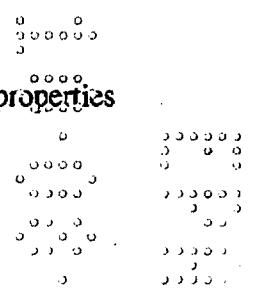
- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

**STORAGE AND DISPOSAL**

Copper Shield 82 should be disposed in a responsible manner, including recycling.

**WARRANTY STATEMENT**

If used as intended, Copper Shield 82 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.



**Optional Label Claims:**

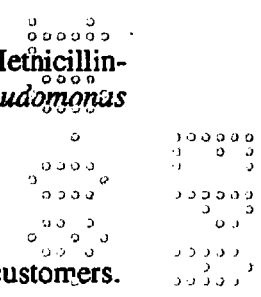
**[Residential]**

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- This product kills \*bacteria continuously.
- Kills bacteria continuously
- This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously kills bacteria on its surface
- Continuously reduces bacterial contamination
- Kills/eliminates/reduces germs/bacteria left behind (by dirty hands)
- Works even when you're sleeping.
- Provides On-Going Protection
- Continues to reduce/kill bacteria even when you don't have time to clean/disinfect

\* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

**[Industrial and Commercial]**

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills \*bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface
- Continuously kills bacteria left behind on this surface by users/the public/your customers.



11/11

\* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

