

85604-1

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 Chase Brass and Copper Co., LLC
Technology Sciences Group, Inc.
1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036

Subject: Eco Brass
EPA Registration Number 85604-1
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 cursive script that reads "Marshall Swindell".

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

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ECO BRASS AND ASSOCIATED FABRICATED PRODUCTS MASTER LABEL

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

[Alloy Label – Front Panel]

ECO BRASS AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient:

Copper	73.0%
Other	27.0%
Total	100%

EPA Registration No. 85604-1
EPA Establishment No. 85604-XX-XXX

Made in the United States by
Chase Brass and Copper Co., LLC
14212 Co. Rd. M-50
Montpelier, OH 43543

Net Weight: XXX lbs XXX ounces of ECO BRASS

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. 85604-1

DIRECTIONS FOR USE

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

ECO BRASS

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 ECO BRASS Antimicrobial Copper Alloys and fabricated products made from ECO BRASS Antimicrobial Copper Alloys under EPA Registration Number 85604-1.]

A list of components that may be fabricated out of ECO BRASS Antimicrobial Copper Alloys is specified below. ECO 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

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- 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

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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

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)

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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.

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ECO BRASS – Fabricated Products

The ECO BRASS fabricated products listed above may be sold and distributed under EPA Registration Number 85604-1. Products fabricated with ECO 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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ECO BRASS

Fabricated Product Label

FRONT

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

ECO 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 ECO BRASS

BACK

ECO 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. 85604-1
Manufactured by: [Product Manufacturer Company Name and Address]
Chase Brass and Copper Co., LLC, 14212 Co. Rd. M-50, Montpelier, OH 43543

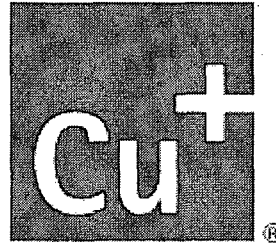
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11/10, 22 2012
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[Optional Logo for Use with Alloy Label or Fabricated Product Label]

Antimicrobial
Copper



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