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



United States Environmental Protection Office of Pesticide Programs Agency

NOV - 8 2012

Technical Sciences Group Inc. c/o Libertas Copper LLC dba Hussey Copper 1150 18th Street, Suite 1000 Washington, D. C. 20036

Attention: Micah T. Reynolds

Regulatory Consultant

Subject: MD-CU 29 2

EPA Registration No. 89187-2

Notification Dated October 10, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification

- Label Notification to replace marketing logo and update company name

General Comments:

Based on a review of the submitted material, the following comments apply:

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your 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
Antimicrobial Division (7510P)

SE	PA						

OPP	Identifier	Number

\$EPA	Environmental Protection Ag Washington, DC 20460			jency	A	mend	ration Iment			
							ther			
Company/Product	Numbe	<u> </u>	Applicati	on for i	Pesticide - \$				3 Dr	oposed Classification
1. Company/1 roduct	INUMBE	89187-2	•		Marshall	•	ı	l		•
4. Company/Product MD-CU ₂₉ 2	(Name)				PM# 33					None Restricted
	s Of Ap	plicant (Include ZIP Co	ode)			d Review.	In acc	ordance	with f	FIFRA Section 3(c)(3)
Libertas Copper LLC dba Hussey Copper 100 Washington Street				(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No						
Leetsdale, Pe	ennsy	/Ivania 15056			ł					
Check	cif this is	s a new address			Product Nan	ne				
				Se	ction II					
Amendment – E	Explain t	pelow.				inted labels i				
Resubmission i	n respor	nse to Agency letter da	ated			letter dated				
Notification – Ex	xplain b	elow.			=	" Application Explain Belo				
						CAPIAITI DEIU				·
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Label Notification to replace marketing logo and update company name. 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@tsgusa.com , phone (202) 828-8967, or fax (202) 872-0745.										
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Material This Prod	uct Will	Be Packaged In:						-		
Child Resistant Pack	caging	Unit Packaging		Water	Soluble Packagii	ng	2. Ty	pe of Con	itainei	
Yes*		Yes		Yes			Meta	Metal		
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be submitted		Unit Packaging wgt.	Container	Unit Pa	ackaging wgt.	Container	1	Pap		ecify)
3. Location of Net Co	ntents i	nformation	4. Size(S) R	etail Contai	ner	5.	Locatio	n of Label		
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6. Manner in Which L	abel is	Affixed to Product	Lithogra Pager g Stencile	lued		Other				
_				Sec	tion IV					
1. Contact Point (Con	mplete it	tems directly below for	identification	of individua	l to be contacted	, if necessary	ı, to pro	cess this a	applic	ation
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 Reference (Stamped) (Stamped) (Cstamped)										
2. Signature Miss Raw				3. Title Regulatory Consultant to Hussey Copper Ltd.				(((((
4. Typed Name Micah T. Reynolds			5. Date	5. Date October 10, 2012			(()			



Technology Sciences Group Inc.

1150 18th Street, Suite 1000 Washington, DC 20036 Direct: (202) 828-8967 Fax: (202) 872-0745

E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Regulatory Consultant

October 10, 2012

Hussey Copper

MD-CU₂₉ 2, EPA Reg. No. 89187-2

Notification to Update Marketing Logo and Company Name

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7510P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Document Processing Center (NOTIF)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Libertas Copper, LLC dba Hussey Copper, is submitting the enclosed label notification to update a marketing logo and to update the company name. A Company Address Update (COADR) letter has been filed with Kathleen O'Malley of OPP/ITRMD to update the company database. The following documents are herein submitted supporting this notification:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) One (1) copy of the product labeling with changes highlighted;
- 3) Three (3) copies of the revised product label.

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 Hussey Copper

Enclosures

MD-CU₂₉ 2 ANTIMICROBIAL COPPER ALLOYS AND ASSOCIATED FABRICATED PRODUCTS MASTER LABEL

The Master Label consists of the label that will accompany the Antimicrobial Alloys and a label that will accompany each product fabricated using a registered alloy from MD-CU₂₉ 2.

[Alloy Label - Front Panel]

MD-CU₂₉ 2 AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient:

Copper

91.3%

Other

8.7%

Total

100%

EPA Registration No. 89187-2 EPA Establishment No. ***** Made in the United States by Hussey Copper 100 Washington Street Leetsdale, Pennsylvania 15056

Net Weight: XXX lbs XXX ounces of MD-CU₂₉ 2

DIRECTIONS FOR USE

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

MD-CU₂₉ 2

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 MD-CU₂₉ 2 Antimicrobial Copper Alloys and fabricated products made from MD-CU₂₉ 2 under EPA Registration Number 89187-2.]

A list of components that may be fabricated out of MD-CU₂₉ 2 Antimicrobial Copper Alloys is specified below. MD-CU₂₉ 2 Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- o Bedrails, footboards
- 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
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- 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
- o Faucet: handles, spigot, drain control lever
- O Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- o Paper towel holders, facial tissue holders, toilet paper holders
- o 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)
- o Door handles, doorknobs (outer touch surfaces)
- o Grab bars in bathrooms showers and bathtubs
- o Panic bars on emergency room doors
- Towel bars

- Showerheads
- o Countertops and tabletops (non-food use only)
- o Hinges, locks, latches, and trim
- o Door stops, door pulls, and protector guards
- o Toilet and urinal hardware, levers, push buttons
- o Toilet seat inlay for lifting of seat
- o Closures
- Vertical locking arms
- o Vertical cover guards
- o Protection bars
- o Light switches, switch plates
- o Visitor chairs: armrests, metal frames
- o Thermostat covers, control knobs and wheels
- o 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)
- o Floor tiles
- o Ceiling tiles (non-porous)
- o 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

- o Intravenous (IV) poles, bases, hangers, clips
- o Trays (instruments, non-food contact)
- o Pans (bed)
- o Walkers, wheelchair handles, and tubular components
- o Computer keyboards: keys, housings, computer mouse surfaces
- o Exercise and rehabilitation equipment, handles, bars
- o Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- o 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
- o Medical records: Chart holders, clipboards, filing systems
- o Storage Shelving: wire shelving etc. for medical supplies
- o Grab handles on privacy curtains
- o Lids of laundry hampers, trash canisters, and other containers
- o Bedside pitchers
- Closet rods and hangers
- o Television controls: knobs, buttons, remote
- o Monitor (television, computer, etc.) housing
- Cup Holder
- o Toothbrush holder
- o Soap holder
- Magazine rack
- o Signage
- Coat rack and hooks
- o Shower curtain rings
- Radiator cover
- Bracelets
- o Pens
- o Badge clips
- Name tags
- o Patient gown snaps
- o Window sills, pulls and locks
- Electrical wallplates

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- o Cash registers: housing, keypads
- o ATM machines: keys, housing
- o Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- o Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- o Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- o Soap dispenser (wall mounted): push bar and dispenser itself
- o Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- O Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- o Casement (cranks, levers, hinges)
- o Single and double-hung windows (locks and pulls)
- o Light switches, switch plates

- o Lids of laundry hampers, trash canisters, and other containers
- o Magazine rack
- o Signage
- Coat rack and hooks
- o Shower curtain rings
- Radiator cover
- Bracelets
- o Badge clips
- o Name tags
- Vending machines (non-food contact only)
- Window sills
- o Electrical wallplates
- o Clip boards
- o 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)
- o Bedrails, footboards
- Handrails
- o Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- o Faucet: handles, spigot, drain control lever
- o Paper towel holders, facial tissue holders, toilet paper holders
- o Door handles, doorknobs (outer touch surfaces)
- o Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- o Hinges, locks, latches, and trim
- o Door stops, door pulls, and protector guards
- o Toilet and urinal hardware, levers, push buttons
- o Toilet seat inlay for lifting of seat
- Light switches, switch plates
- o Thermostat covers, control knobs and wheels
- o Telephone handsets and surfaces (housings), keypad
- o Floor tiles
- o Ceiling tiles (non-porous)
- Wall tiles
- o Computer keyboards: keys, housings, computer mouse surfaces
- o Exercise equipment, handles, bars
- o Windows (crank), Locking mechanism, pull handles
- o Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)

MD-CU₂₉ . £PA Reg. No. 89187-2) Master Label version dated October 10, 2012

- o Casement (cranks, levers, hinges)
- o Single and double-hung windows (locks and pulls)
- o Television control knobs and buttons
- o Lids of laundry hampers, trash canisters, and other containers
- o Bedside pitchers
- o Closet rods and hangers
- o Television remote
- o Cup Holder
- o Toothbrush holder
- o Soap holder
- o Magazine rack
- o Coat rack and hooks
- o Shower curtain rings
- o Radiator cover
- Window sills
- o Electrical wallplates
- o Baby cribs: rails, fittings, brackets, supports
- o Bowl stands
- o Office supplies: paper clips, staplers, tape dispensers
- o Monitor (television, computer, etc.) housing

Mass Transit Facilities

- Handrails
- o Stair rails, tubular railing, and supports; elbows and brackets
- o Door push plates, kick plates
- o Door handles, door knobs (outer touch surfaces)
- o Grab bars and handles
- o Tiles: wall, floor, ceiling (non-porous)
- o Chairs and benches: rails, backs, legs, seats
- o Window sills, pulls, and handles
- o Signage
- o 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
- o Chapel pews
- o Eye glass frames and protective eye wear
- o Pens
- o Combs
- o Ashtrays

Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.

MD-CU₂₉ 2 - Fabricated Products

The MD-CU₂₉ 2 fabricated products listed above may be sold and distributed under EPA Registration Number 89187-2. Products fabricated with MD-CU₂₉ 2 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.

MD-CU₂₉ 2 **Fabricated Product Label**

FRONT

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

MD-CU₂₉ 2

Active Ingredient:

Copper91.3%

(Total

Other..... 8.7% 100 0%]

See [Back/Side Panel][Insert] for Directions for

Net Weight: XXX lbs XXX ounces of MD-CU29

BACK

MD-CU₂₉ 2

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. 89187-2 EPA Est. No. [Product Manufacturer Nu Manufactured by: [Product Manufacturer Company Name and Address] Hussey Copper, 100 Washington Street, Leetsdale, Pennsylvania 15056 EPA Est. No. [Product Manufacturer Number] 89187-XX-XXX [Optional Logo for Use with Alloy Label or Fabricated Product Label]

Antimicrobial Copper



