



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

July 31, 2017

Georgia Anastasiou Agent for, Elemental Fluid Technologies c/o Lewis & Harrison 122 C St. NW, Suite 505 Washington, D.C. 20001

Subject: Notification per PRN 98-10 – Minor label modifications Product Name: EFT-70/30 EPA Registration Number: 92374-1 Application Date: June 7, 2017 Decision Number: 530504

Dear Ms. Anastasiou

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, you may contact Tara Flint via email at <u>flint.tara@epa.gov</u> or Eric Miederhoff at Miederhoff.eric@epa.gov.

Page 2 of 2 EPA Reg. No. 92374-1 Decision No. 530504

Sincerely,

E. Minderhoff

Eric Miederhoff Product Manager 31 Regulatory Management Branch I Antimicrobials Division (7510P) Office of Pesticide Programs

92374-1 The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

NOTIFICATION

07/31/2017

EFT-70/30

Electronic Ionization System

EFT 70/30 is designed to generate biocidally active copper and silver ions *in situ* and must be installed and operated in accordance with the instructions provided.

ACTIVE INGREDIENTS:

Co	opper (as metallic)	70.0%
Si	lver (as metallic)	30.0%
TOTAL		100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE [BACK, SIDE, REAR] PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No. 92374-1 EPA Est. No.: XXXX-XXX-XX

Net Contents: XXXX Copper-Silver Alloy Bars

Distributed by: Elemental Fluid Technologies 565 Metro Place South Suite 300 Dublin, OH 43017

DIRECTIONS FOR USE

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

Prior to using this product, carefully review the entire label and the accompanying User Manual. This product must be installed and operated in accordance with the instructions presented in the User Manual. Installation of this product must be done by an individual trained in the proper installation of the product. Any adjustments or calibrations of the product must also be done by a trained individual.

This product is for secondary treatment of commercial potable water supplies and can be used to treat both hot and cold water. Upon use, this product is designed to generate biocidally active levels of copper and silver ions, which can prevent and control microbial contamination (i.e., odor, staining and corrosion inducing bacteria). This product can be used in hospitals, nursing homes, hotels, apartments, condominiums, office buildings, manufacturing plants, commercial buildings, government buildings, grocery stores, dental offices, training/workout facilities, showering facilities, dormitories, correctional facilities, retail facilities and amusement parks.

This product is comprised of three parts: 1) a Flow Cell, which is the electrolytic compartment and houses a series of copper/silver electrodes; 2) a Flow Measurement device, which continuously measures the water flow; and 3) a Control Panel, which supplies current to the electrodes based on the signal received from the Flow Measurement device. Each of these components is described in detail in the User Manual.

Once this product is operative, the target copper ion level in water is 0.20 to 0.80 parts per million (ppm), <u>at point of use</u>, and the resulting silver ion level is 0.02 to 0.08 ppm or greater. The copper and silver levels in treated water must not exceed 1.3 ppm and 0.1 ppm, respectively.

Monitoring Requirements

In order for the EFT-70/30 to perform at an optimal level, it is important that users carefully monitor the factors noted below and sample the treated water as described in the "Biocide Sampling" section.

1. pH Levels

High pH has been shown to effect copper and silver ionization. In situations where the pH of the target water exceeds 8.3, lower pH to 7.2 or less before ionization commences.

2. Copper Levels

If sampling of the treated water shows that copper levels drop below 0.4 ppm, at the dose point, then adjust the EFT system to maintain a minimum concentration of 0.4 ppm copper.

3. Lime-Scale Build Up and Water Hardness

To prevent lime-scale build up, softening treatment should be employed pre-ionization if the water hardness exceeds 200 mg/l of calcium. In addition, if scale build-up is observed on the electrodes, remove the scale by standard cleaning procedures.

Biocide Sampling Procedures

Sampling for copper levels should occur at a point within 3 feet of the flow cell installation. Testing of end point levels should occur at random points throughout the piping distribution network but must always include sampling from the furthest points away from dosing to ensure that target levels are being achieved consistently throughout the system. The number and location of sample points will depend on the facility size and the complexity of the piping distribution network. It is also advisable that the bacterial quality of the water system be tested in tandem with copper testing.

Both on and off-site testing for copper can be conducted. For on-site testing, use a photometric test kit. On-site testing should allow for calibration of dosing equipment on-site. The installation of an online copper level measurement system is recommended where feasible. <u>On-site tested</u> <u>be conducted on a weekly basis.</u>

For off-site testing, all sample points should be assayed on a monthly basis. Off-site testing for copper should be performed in accordance with ASTM 1688-12 "*Standard Test Methods for Copper in Water*". Sample containers should be pre-treated with nitric acid to allow for the sample to be reduced to a pH of 2 or less immediately at the time of sampling.

Storage and Disposal

Pesticide Storage: Store this product in a cool, dry place away from children. Pesticide Disposal: Non-reusable product. When spent, do not attempt to disassemble, recharge, or refill flow cells. Return flow cells to Elemental Fluid Technologies, Inc. for reconditioning or recycling.

Warranty

EFT warrants that this product complies with the specifications expressed on this label and is reasonably fit for the purposes stated on the label when used in accordance with all directions, instructions, and manuals and under normal use. To the extent consistent with applicable law, neither this warranty nor any other warranty of merchantability or fitness for any particular purpose, express or implied, extends to the use of the system or device in a manner contrary to this label, instructions and manuals.

Claims

- Generates biocidally active copper and silver ions.
- [Prevents] [Controls] [Inhibits] microbial contamination (i.e. odor, staining and corrosion inducing bacteria) in both hold and cold water systems.
- [Prevents][Controls] fouling microbial contamination in both hot and cold water systems.
- [Reduces] [Controls][Inhibits] algal and corrosion inducing bacterial contamination in water distribution networks and recirculation systems.
- Proprietary knowhow, precision engineered to deliver proper and consistent dosing of biocidally active copper and silver ions for antimicrobial control (i.e. odor, staining and corrosion inducing bacteria).
- Eliminates the need for manual addition of biocides into water systems. This product does it automatically.
- Consistent and accurate dosing = consistent and effective control
- Used in hundreds of facilities worldwide.



EFT Control Units User Manual





Touch Screen Interface Control Units: <u>Contents:</u>

Technical Specifications

Adjusting Settings / Programming Details

Data Logging

Cable Connections

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Technical Specifications

Power supply : 110/230 V (100-260 VAC full range)

Frequency : 50/60 Hz

Power consumption : 700mA

Voltage supply to electrode : Max. 24 V or 12 depending on switch setting

Current supply to electrode : Depending on ampere setting and water conductivity.

Adjustable Settings:

Time: Day Time; up to 3 daily start time points (for recirculation systems).

Pump: up to 3 daily runtimes; "Permanent" shortcut setting.

Optional pump control: flow monitor and backwash control.

Ionization: One main electrode outputs; up to 3 daily runtimes amperage 1-10 A programmable or controlled by flow.

Optional: 1 AUX electrode output; up to 3 daily runtimes; amperage control 1-7A programmable.

Housing material: Sheet metal

Dimensions (mm): Width = 430, Depth = 140, Height = 220

Weight: 5.5 kg

Supported electrodes: Main and Auxiliary

Supported sensor types: Flow sensor, Temperature sensor and Conductivity sensor

Supported alarm types: Volt free contact

Processing Capacity: Windows CE Embedded c/c LAN/Ethernet connecitivy.

Interface: TFI Touchscreen



Powering On

Prior to powering on the unit proper please select the Electrode Voltge output.

On the Right Hand Side of the control unit select either 12V or 24 V:

If no voltage is selected the unit will not power on.

Following voltage selection switch on the control unit using the power switch on the left hand side of the unit.



Boot Sequence:

A Windows CE screen will be flashed on the display for few seconds and the application software will start booting up the EFT Controller Unit.

On application software execution EFT logo will flash for 15 seconds on the TFT screen as per below screen shot:





Adjusting the Settings



To enter the Home Screen, press either green button (Allow "Safe Setting") or press red button ("Cancel", with Previous Setting)

All control units are password protected.

A default password will be provided at installation.

To ensure safe opperation no settings can be adjusted without a valid password.

To enter password tap on the password box and with the on screen keyboard enter the password.

Hit return on the on screen keyboard.

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Home Screen



HOME SCREEN allows valid user to access operation, settings and view status. Invalid user can only view status and events, any other operations will redirected to authentication screen.





To access runtime options - for use in cooling towers or other recirculation systems - Tap RUNTIME





To Adjust 1st Run Time Tap on the time bar and when the dialogue box appears Tap OK. Adusts the Start and Run Time according to required parameters. To use additional Run Times Tap the required Start Time Check Box Adjust as per Run Time 1

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To adjust, press and drag the respective slider to the right (increase) or left (decrease)

To leave screen and return to the Operation Time Overview, press either green button ("Safe Setting") or press red button ("Cancel", will discard any changes)

To leave screen and return to operation any clock time during the day or night.

Runtimes: First adjust operation time of the pump, then of the electrode(s) can be set to the same duration or pump might be set to run longer (as is usual for treatment of closed circulations).

Electrodes cannot exceed pump runtime, thus their runtime bars cannot be moved beyond or right of the pump's set point.

For sole pump operation, leave or move the electrode runtime slider all the way to the left of the bar (thus setting numeric values to "00:00").





If Start Time 2 is enabled (box is checked) the second row will appear indicating the Time Settings for the second start time



Flow & Additional Settings



To Access Flow Meter and Additional Settings Tap SETTINGS



Adjusting Time & Date

SEL	EMENTAL FLUID TECHNOL	.OGIES	29/02/	/2016::14:15:35
DA	dd-mm-yyyy TE 29-02-2016	TIME 1	4:15	UPDATE
🗆 Us	Backwash			
🗆 🗆 Use	Flow Monitor			
🗆 Usi	Auxi Electrode			
	To leave SI to the Hom either grees Setting") o ("Cancel", changes	ETTING and return the Screen, press in button ("Safe r press red button will discard any		Note: The usage of 24-hour clock all hroughout the interface. Example "14:15[hours]"= 02:15 p.m. The usage of date all throughout the nterface. Example "29-02-2016[date:month year]"= 29th Feb 2016
Date adjustme: UP/DOWN arr	nts using the row keys.	Tir UP	me adjustments P/DOWN arrow	using the keys.



Using Backwash

	ES 29/02/2016::14:15:58
dd-mm-yyyy DATE 29-02-2016	TIME 14:15 UPDATE
 ✓ Use Backwash □ Use Flow Monitor □ Use Auxi Electrode 	
	X

To allow for Backwashing of Filters (Cooling Tower Installations) TAP Backwash. If the Backwash is enabled then all the other modes (e.g. Pump, Main Electrode) go into IDLE mode



Enabling Flow Meter & Proportional Dosing



To enable Flow monitor check the box on the left of "Use Flow Monitor".

After Enabling the Use Flow Monitor set the Minimum Current value. Press the green Button (Safe Setting) or Red Button (Cancel the setting).

Note - Seek technical support on use of flow monitors. All monitors and meters must be calibrated on site and according to site parameters.



Enabling Flow Meter & Proportional Dosing



Set Frequency of flow meter using the drop down box. Frequency setting will depend on pipe size and flow rate. Please refer to Technical Support during initial calibration.

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Adjusting Electrode Settings



To Access the Electrode Settings: In the Home screen, Tap ELECTRODE



Adjusting Electrode Settings



To Adjust the Electrode Current (in recirculation systems): Use the slider or the drop down box to select the required current.



Adjusting Temperature Settings



To Access the Temerature Settings and Adjustments Simply Tap TEMPERATURE on the Home Screen.

Note: Functions only available with systems which have had thermostat and or calorifier connections.



Adjusting Temperature Settings

ELEMENTAL FLUID TECHNOLOGIES	29/02/2016::14:07:39
Water Temperature	
31°C 🔹	

To Adjust the Temperature Setpoint for Calorifer Control: Use the slider or the drop down box to select the required temperature.

Note: Where thermostat is installed temperature readings will be logged regardless of calorifer connection.



Accessing the Status Screen



To Access the Current System Status Simply Tap STATUS on the Home Screen.

The Status Screen will display all current activity.



Viewing the Status Screen



The above screen shot shows that the flow monitor is activly set and detecting flow. The temperature is set to 28 but no thermostat is present or connected. No Ionisaiton is occuring and the Actual Current is not displayed.



Viewing the Status Screen



This example shows that the flow monitor is not being used (not displayed), that the main and auxilary electrode are being used and have been set to 7 and 0.7 amps respectively.



Accessing the Data Log



To Access the Data Log Simply Tap Events on the Home Screen.



Accessing the Data Log

ELEMI	ENTAL FLUID TECHNOLOGIES	29/02/2016::14:20:53
No	Events	
0.5		
85	29/02/2016::14:13:- Auxi Electrode is Active	
86	29/02/2016::14:15:- Flow Monitor is Enabled	
87	29/02/2016::14:15:- Auxi Electrode is Disabled	
88	29/02/2016::14:15:- Auxi Electrode is Idle	
89	29/02/2016::14:16:- Flow Monitor is Disabled	
90	29/02/2016::14:16:- Back Wash is Enabled	
91	29/02/2016::14:16:- Pump is Idle	
92	29/02/2016::14:16:- Main Electrode is Idle	
93	29/02/2016::14:17:- Back Wash is Disabled	
94	29/02/2016::14:17:- Pump is Active	
95	29/02/2016::14:17:- Main Electrode is Active	
96	29/02/2016::14:19:- Auxi Electrode is Enabled	
97	29/02/2016::14:19:- Auxi Electrode is Active	
98	29/02/2016::14:20:- Auxi Electrode is Disabled	
99	29/02/2016::14:20:- Auxi Electrode is Idle	



In the Events Screen the 100 most recent events are logged and displayed. If temperature is being monitored this will also be displayed. All set currents and outputs will be displayed.

A full data log - detailing events back to 1 year previous is available by remote access or SD Card loading.

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Accessing the Data Log









All external cables connections are located to the underside of the control unit. Please refer to the above image for exact location of each:

230V - Input Power

- Pump Power output (110V to 260V AC)
- Temp Power output to calorifier (7KW max)
- Aux Current Supply to Auxilary Electrode

Main - Current Supply to Main Electrode

FSense - Input from external Flow Meter

BackW - Power Out to 24 V DC solenoid Valve

VLTF - Output to Volt Free connection for alarm reporting

TSENSE - Input from external Thermostat

Each connection is of a different type to assist in prevention of wrong connection.



2 Pin Connector -Electrodes



3 Pin Connector -Inputs & OutPuts



Output to Pump



EFT –Pump Connector Details

EFT

			Pump Cor	nnector			
Station Info			Station -3	}			
Label ID			Pump				
Connection Type		Conn: Round Connector, 3Pin, Male					
	Sourc	e	Destination			Remarks	
Position	Signal	Wire Colour	Position	Signal	Wire Colour		
1	Line	RED		Line			
2	Neutral	BLACK		Neutral			
3	Ground	BLUE	1	Ground			

EFT - Temp Connector Details

			Temp Cor	nector			
Station Ir	ifo		3				
Label ID			Temp				
Connection Type			Conn: Ro	Conn: Round Connector, 3Pin, Male			
Source			Destination			Remarks	
Position	Signal	Wire Colour	Position	Signal	Wire Colour		
1	Line	RED		Line			
2	Neutral	BLACK		Neutral			
3	Ground	BLUE	· · · · · ·	Ground			

EFT – Auxilary Electrode Connector Details

			Aux Con	nector								
Station Info			Station -3					Station -3				
Label ID			Aux									
Connecti	onnection Type		Conn: Round Connector, 2Pin, Male									
	Sourc	e		Destinati	ion	Remarks						
Position	Signal	Wire Colour	Position Signal Wire Colour									
1	Line	RED		Positive								
2	Neutral	BLACK		Negative								



EFT – Main Electrode Connector Details

		Μ	ain Conne	ctor		
Station Info			Station -3			
Label ID	Label ID		Main			
Connecti	on Type		Conn: Ro	und Conne	ctor, 2Pin, Mal	е
	Sourc	e		Destinati	on	Remarks
Position	Signal	Wire Colour	Position	Signal	Wire Colour	
1	Line	RED	Positive			
2	Neutral	BLACK		Negative		

EFT – Main Electrode Connector Details

		Flow	Sensor Cor	nector		
Station In	nfo		Station -3			
Label ID			F Sense			
Connecti	on Type		Conn: Rou	und Conne	ctor, 3Pin, Mal	le
	Sourc	e		Destinat	ion	Remarks
Position	Signal	Wire Colour	Position	Signal	Wire Colour	
1	Flow Signal	RED		Flow Signal		
2	Flow Ground	BLACK		Flow Ground		
3	Flow Supply	Yellow Green		Flow Supply		Yellow Green (5 Volts)

EFT - Back Wash Connector Details

		Back	Wash Cor	nector		
Station In	ation Info		Station -3			
Label ID	el ID Backw					
Connecti	on Type		Conn: Ro	und Conn	ector, 3Pin, Ma	ale
	Sour	ce	Destination			Remarks
Position	Signal	Wire Colour	Position	Signal	Wire Colour	
1	Line	RED		Line		
2	Neutral	BLACK		Neutral		
3	NC	Yellow Green		NC		NC - No Connection



			Volt Free Co	onnector		
Station Ir	fo		Station -3	3		
Label ID			VLTF			
Connecti	on Type		Conn: Ro	und Con	nector, 3Pir	, Male
	Sourc	e		Destinat	Remarks	
Position	Signal	Wire Colour	Position	Signal	Wire Colour	
1	NC	RED		NC		NC - Normally Closed
2	Zero Volts	BLACK		Zero Volts		Connects to modem ground
3	NO	BLUE		NO		NO - Normally Open

EFT – Temprature Sensor Connector Details

		Ter	nperature Se	ense Conn	ector	
Station Info			Station -3			
Label ID			T Sense			
Connection Type			Conn: Round Connector, 3Pin, Male			
Source			Destination			Remarks
Position	Signal	Wire Colour	Position	Signal	Wire Colour	
1	Sensor Input	RED		Sensor Input		
2	Ground	BLACK		Ground		
3	24 Volts	Yellow Green		24 Volts		



Flow Cell Installation

Typical 1 kg Flow Cell



In general EFT flow cells are installed in a bypass configuration. This is to allow for ease of access and replacement of electrode cells.

Valves should be installed both before and after the flow cell and on the main line to be bypassed.

It is prefered to install flow cells vertically but it is not essential. Vertical installation reduces the amount of residue buildup within the flow cell.

Flow cells are available with female PSP threaded fittings from 1" to 3". Larger sizes are available in flanged connections.





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Flow Cell Installation



Typical Bypass Schematic:

Note: Two EFT Electrodes Depicted

Valves Installed on Main Line and Bypass to allow for electrode replacement without interuption of water flow.



Flow Cell Assembly - Electrode Replacement



Parts Listing:

- 1: Main Flow Cell Body
- 2: Polycarbonate Flow Cell Lid
- 3: Flow Cell Base Plate Insulator
- 4: Flow Cell Gasket
- 5: M6 Nyloc Nut
- 6: M6 x 50 Hex Bolt
- 7: M6 Spring Washer
- 8: M6 Plain Washer

Electrode Plates Are Push fit. Simply remove old electrodes and press into place new metal. Hammer home using a Nylon hammer or mallet.

Assemble as per drawing.

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