



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 27, 2017

Georgia Anastasiou
Agent for
Elemental Fluids Technology, LLC
c/o Lewis & Harrison
122 C St. NW, Suite 505
Washington, DC 20001

Subject: Notification per PRN 98-10 – Minor label modifications
Product Name: EFT-90/10
EPA Registration Number: 92374-2
Application Date: June 7, 2017
Decision Number: 530301

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 Joe Daniels at (703) 347-8669 or via email at daniels.joseph@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "E. Miederhoff". The signature is written in a cursive style with a large, stylized initial "E".

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

NOTIFICATION

92374-2

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:

07/27/2017

EFT-90/10

Electronic Ionization System

EFT- 90/10 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:

Copper (as metallic)...	90.0%
Silver (as metallic)	10.0%
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

EPA Reg. No. 92374-2
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), at point of use, 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-90/10 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. On-site tested be conducted on a weekly basis.

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 hot 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.