82012-3

07-28-2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 28 2011

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. Joe Green Counsel to Copper Development Association Copper Development Association 260 Madison Avenue New York, New York 10016

Mail to: Joe Green Kelley Drye & Warren LLP Washington Harbour, Suite 400 3050 K Street, NW, Washington, DC 20007-5108

Subject: Antimicrobial Copper Alloys Group III EPA Registration Number 82012-3 Your Notification Dated June 28th, 2011 EPA Received Date July 1st, 2011

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add a logo to the product labeling, is acceptable.

The notification has been made part of the registration file.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell

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

Please read instructions or	reverse before converse	ting form.	(internet)	Form Approv	red. OMB No.	2070-0060	Print Form	
United States Environmental Protecti Washington, DC 20			on Agency		Registr Amend × Other	ration	OPP Identifier Number	
	A States and	Application	for Pesticio	le - Secti	on I		Section 1	
1. Company/Product Number 82012-3			2. EPA Product Manager 3. Marshall Swindell				oposed Classification	
4. Company/Product (Name) Antimicrobial Copper Alloys Group III			PM# 33	PM#			None Restricted	
5. Name and Address of Applicant (Include ZIP Code) Copper Development Association Inc. 260 Madison Avenue New York, NY 10016			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No.					
Check if th	Carl Trible	Product Name						
	14. 14.1.2		Section - I					
Amendment - Expla	dated		Final printed labels in response to Agency letter dated "Me Too" Application. Other - Explain below.					
I ünderstand	that it is a v EPA. (Please	iolation o	f 18 U.S.C	. Sec. 1 ation).	001 to wi		of this product make any false	
Yes* X No	Yes No	No. per	X No Gi			Metal Plastic Glass Peper	stal Istic Isse	
* Certification must be submitted	Unit Packaging wgt.		Package wgt	container		Other (S	pecify)None	
3. Location of Net Content	4. Size(s) Retail NA no contain	iner X On Label On Labeling accompanying product						
6. Manner in Which Label	is Affixed to Product	Lithograp Paper glu Stenciled	the second s	C. Culor	Attached	to Bill	of Lading	
			Section - IN					
1. Contact Point /Comple	te items directly below t	for identification o	of individual to be	contacted, it	necessary, to j	process this	application.)	
Name Joseph J. Green			Councel to CDA			Telephone 202-342	e No. (Include Area Code)	
	tements I have made on any knowingly false or r ie law.		attachments the				6. Dete Application	
2. Signature			3. Title Counsel to CDA					
4. Typed Name Joseph J. Green			Date une 28, 2011				C	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

Yellow - Applicant Copy

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ÉPA APPLICATION FOR PESTICIDE (Section II Cont'd)

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.

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KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

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JOSEPH J. GREEN DIRECT LINE: (202) 342-8849 EMAIL: jgreen@kelleydrye.com

July 1, 2011

VIA HAND DELIVERY Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U. S. Environmental Protection Agency One Potomac Yard, Room S-4900 2777 South Crystal Drive Arlington, VA 22202-4501

Re: Antimicrobial Copper Alloys Groups I-VI EPA Registration Nos. 82012-1, 82012-2, 82012-3, 82012-4, 82012-5, and 82012-6 Notification to Add Product Logo to Label Per PR Notice 98-10

Dear EPA:

On behalf of the Copper Development Association ("CDA"), please find the enclosed notifications to add the trademarked "Cu⁺" logo to the approved labels for Antimicrobial Copper Alloys Groups I-VI (EPA Registration Nos. 82012-1 through -6) per Pesticide Registration Notice 98-10. Enclosed is a cover letter explaining the notifications, as well as individual copies of Form 8570-1 and amended labeling for each of the six Antimicrobial Copper Alloy products.

If you have any questions, please contact me at 202.342.8849 or JGreen@KelleyDrye.com.

Respectfully submitted,

Joseph J. Green

Counsel to the Copper Development Association

Enclosures

KELLEY DRYE & WARREN LLP

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Marshall Swindell, Team 33 Office of Pesticide Programs U.S. Environmental Protection Agency One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

Re: Antimicrobial Copper Alloys Groups I-VI EPA Registration Nos. 82012-1 through 82012-6 Notification to Add Product Logo to Label Per PR Notice 98-10

Dear Mr. Swindell:

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NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

On behalf of the Copper Development Association ("CDA"), enclosed please find notifications to add the trademarked "Cu⁺" logo to the approved labels for Antimicrobial Copper Alloys Groups I-VI (EPA Registration Nos. 82012-1 through -6). Enclosed are individual copies of Form 8570-1 and amended labeling for each of the six Antimicrobial Copper Alloy products. The logo is added as an optional attachment on each label.

The notification is consistent with the requirements of Pesticide Registration Notice 98-10, Section II.N, which provides for label changes that are not misleading (and are otherwise consistent with 40 C.F.R. Part 156) and "involve no change in the ingredients statement, signal word, use classification, precautionary statements, statements of practical treatment (First Aid), physical/chemical/biological properties, storage and disposal, or directions for use." Addition of the "Cu⁺" logo does not involve changes to any of these labeling provisions or, most importantly, alter any claims made for the product. "Cu⁺" is a graphic representation of the copper ion that is the active ingredient in Antimicrobial Copper Alloys and a global trademark used to market the copper brand.

CDA and antimicrobial copper alloy product manufacturers will have the option to utilize the "Cu⁺" logo to indicate that their products are made from EPA-registered

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Page Two

Antimicrobial Copper Alloys that have been manufactured consistent with ASTM product specifications, as required by the EPA registrations.

Consistent with the registration requirements for Antimicrobial Copper Alloys, labeling and marketing materials, whether they bear the "Cu⁺" logo or not, are required to include specific claims language, including a statement that the use of copper alloys is a supplemental, not a substitute for, standard infection control practices. As demonstrated since obtaining the original registrations in February 2008, CDA and its member companies are committed to proper stewardship of Antimicrobial Copper Alloys.

If you have any questions, please contact me at 202.342.8849^c or JGreen@KelleyDrye.com.

Respectfully submitted,

seph/J. Green

Counsel to the Copper Development Association

Enclosures

ANTIMICROBIAL COPPER ALLOYS - GROUP III 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 Antimicrobial Copper Alloys - Group III.

[Alloy Label – Front Panel]

ANTIMICROBIAL COPPER ALLOYS - GROUP III AND ASSOCIATED FABRICATED PRODUCTS

Active Ingredient: Copper Other

82.6% 17.4%

Total

100%

EPA Registration No. 82012-3 EPA Establishment No. ***** Made in the United States by ****** Distributed by ******

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Net Weight: XXX lbs XXX ounces of [brand name]

DIRECTIONS FOR USE

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

Antimicrobial Copper Alloys - Group III

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 Antimicrobial Copper Alloys - Group III and fabricated products made from Antimicrobial Copper Alloys - Group III under EPA Registration Number 82012-3.]

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

Touch Surface Components

Healthcare Facilities

- o Bedrails, footboards
- o Over-bed tables
- 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
- 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
- o Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- o 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
- o Towel bars

- o Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- o Door stops, door pulls, and protector guards
- o Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- o Closures
- Vertical locking arms
- o Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- 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
- 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
- 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 corrooms, 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
- o Medical records: Chart holders, clipboards, filing systems
- 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
- o Closet rods and hangers
- o Television controls: knobs, buttons, remote
- o Monitor (television, computer, etc.) housing
- o Cup Holder
- o Toothbrush holder
- o Soap holder
- o Magazine rack
- o Signage
- Coat rack and hooks
- o Shower curtain rings
- Radiator cover
- o Bracelets
- o Pens
- o Badge clips
- o Name tags
- o Patient gown snaps
- o Window sills, pulls and locks
- o Electrical wallplates

Community Facilities (including various public and commercial buildings)

- o 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
- o Soap holder
- o Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- o Toilet paper dispenser (housing)
- o Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- o 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
- Magazine rack
- o Signage
- o Coat rack and hooks
- o Shower curtain rings
- o Radiator cover
- 0 Bracelets
- o Badge clips
- Name tags
- Vending machines (non-food contact only)
- o Window sills
- o Electrical wallplates
- 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
- o Handrails
- o Stair rails
- o Door push plates
- o Sinks: spigots, drains, sinks themselves
- o Faucet: handles, spigot, drain control lever
- o Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- o Grab bars in bathrooms showers and bathtubs
- o Towel bars
- o Showerheads
- Countertops and tabletops
- 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 Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- o Floor tiles
- Ceiling tiles (non-porous)
- o Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- o Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)

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

Mass Transit Facilities

- o Handrails
- o Stair rails, tubular railing, and supports; elbows and brackets
- o Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- o Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- o Chairs and benches: rails, backs, legs, seats
- o Window sills, pulls, and handles
- o 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
- 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.

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Antimicrobial Copper Alloys - Group III - Fabricated Products

The Antimicrobial Copper Alloys - Group III fabricated products listed above may be sold and distributed under EPA Registration Number 82012-3. Products fabricated with Antimicrobial Copper Alloys - Group III 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.

ANTIMICROBIAL COPPER ALLOYS - GROUP III Fabricated Product Label

FRONT

[This (touch surface) (product)] made from Antimicrobial Copper Alloys -Group III

BACK

ANTIMICROBIAL COPPER ALLOYS - GROUP III

- 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

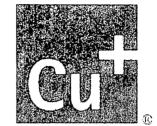
Dispose of by recycling or put in trash.

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. 82012-3 EPA Est. No. [Product Manufacturer Number] 82012-NY-001 Manufactured by: [Product Manufacturer Company Name and Address] CCCCCC Copper Development Association, 260 Madison Ave., NY, NY 10016-240 [Optional Logo for Use with Alloy Label or Fabricated Product Label]

Antimicrobial Copper



Changes to label per PR Notice 98-10

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