



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

[X] Registration
Reregistration

(under FIFRA, as amended)

EPA Reg.

Number:

85353-3

Date of

Issuance: 3 2009

Term of Issuance:

Unconditional

Name of Pesticide Product:

Copper Shield 82

Name and Address of Registrant (include ZIP Code):

Global Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all the data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit required by registration review under FIFRA Section 3(g).
2. Make the following labeling changes:
a. Revise the EPA Registration Number to read, EPA Reg. No. 85353-3.
b. Place the appropriate EPA Establishment Number on the product labeling.

Signature of Approving Official:

[Handwritten signature]

Marshall Swindell, Product Manager, Team 33
Regulatory Management Branch I, Antimicrobials Division

Date:

DEC 23 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Micah T. Reynolds
Regulatory Consultant for,
c/o Global Brass & Copper, Inc.
TSG, Inc.
1150 15th Street, N.W.
Suite 1000
Washington, D.C. 20036

MAR - 1 2011

Subject: CuVerro III
EPA Registration Number 85353-3
Your Amendment Dated December 16th, 2010
EPA Received Date December 16th, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to revise the product labeling which also includes a fabricated product label is acceptable subject to the comments listed below:

- 1) The fabricator cannot make claims about the basic copper alloy product or ingredient or fabricated article (doorknock, handrail, etc.) that conflict with statements required pursuant to FIFRA on either the basic copper alloy product or any fabricated product label. For example, the accepted master label for the basic copper alloy as well as the label for the fabricated product that is included within the master label state "Normal tarnishing or wear of the surface will not impair antibacterial effectiveness." Additionally, in support of your application for registration of the basic copper alloy products, you submitted data supporting your position that tarnish has a beneficial impact on product efficacy against target microorganisms. Hence, the warranty statement, for example, on either the basic copper alloy product or any fabricated product cannot make a non-tarnish claim as that would conflict with the above required label statement.

- 2) The EPA Establishment Number that appears on the labeling for the alloy product labeling and/or the labeling for the fabricated end-use article to be sold or distributed must be that of the establishment where the particular product it is being produced and labeled. For the alloy product, it would be the establishment where the alloy product is produced and labeled. For the fabricated end-use article, it would be the establishment where the fabricated end-use article is produced and labeled. It is the responsibility of the owner of the establishment where the final production takes place to report production, and to maintain books and records under FIFRA Sections 7 and 8 and 40CFR 167 and 169.
- 3) The labels attached to the copper alloy and the end-use fabricated products must contain the name and address of the producer, registrant, or person for whom produced in accordance with 40 CFR 156.10(c).
- 4) The registration record will reflect the product name change as follows:

Old Product Name: Copper Shield 82
New Product Name: CuVerro III

A stamped copy of the labeling is enclosed for your records.

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
Antimicrobials Division(7510P)