

62296-1

6/13/2013

1/10



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

JUN 13 2013

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Isabel Cristina Gaztelu  
**RBR Productions, Inc.**  
P.O. Box 766  
Hartwell, GA 30643

Subject: **Let's Touch**  
EPA Registration No.: 62296-1  
Application Date: May 9, 2013  
Receipt Date: May 17, 2013

Dear Ms. Gaztelu:

This acknowledges receipt of your notification, submitted under the provision of PR Notice 98-10, FIFRA section 3(c) 9.

**Proposed Notification:**

- Updating Storage and Disposal per PRN 2007-4

**General Comment:**

Based on a review of the material submitted, your notification to update as referenced above is acceptable and a copy has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at [campbell.jacqueline@epa.gov](mailto:campbell.jacqueline@epa.gov) or Stacey Grigsby by telephone at (703) 305-6440 or by e-mail at [grigsby.stacey@epa.gov](mailto:grigsby.stacey@epa.gov) during the hours of 8:00am to 4:00pm EST. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Nardy".

Jacqueline Nardy  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 62296-1	2. EPA Product Manager Jacqueline McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Let's Touch	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) RBR Productions, Inc. PO Box 766 Hartwell, GA 30643 <input checked="" type="checkbox"/> Check if this is a new address	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. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 gallon, 1 quart, 8 oz, 1 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Isabel Cristina Gaztelu	Title Owner	Telephone No. (Include Area Code) 800-247-4130
<b>Certification</b> 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 Received <b>(Stamped)</b>
2. Signature 	3. Title Owner	
4. Typed Name Isabel Cristina Gaztelu	5. Date May 9, 2013	



ISABEL CRISTINA

**RBR Productions Inc.**

P.O. Box 766, Hartwell, GA 30643 • Tel: 800-247-4130

*Beauty Care Products For The Educated Professional*

ISABEL CRISTINA GAZTELU president

[www.isabelcristina.com](http://www.isabelcristina.com)

Attention: Jacqueline McFarlane, Project Manager 34  
Regulatory Management Branch II  
Antimicrobials Division  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

Re: Pesticide storage and disposal changes

Jacqueline McFarlane,

Enclosed is the amendment to the label Let's Touch EPA Reg. 62296-1. This amendment includes 2 revisions. The Pesticide Storage and Pesticide Disposal Statement.

Thank you so much,  
Isabel Cristina Gaztelu  
RBR Productions, Inc.

[Optional language]

[LOOSEN CAP TO FILL RESERVOIR  
DO NOT SQUEEZE BOTTLE WHILE POURING]

**NO RUST!!!**

**ISABEL CRISTINA**

**LeT's Touch®**

**DOES NOT RUST  
DOES NOT DULL**

**HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT**

**For Disinfection and Storage of All  
Quality Metal Instruments Used In Salons**

<b>Bactericidal</b>	<b>Fungicidal</b>	<b>Tuberculocidal</b>
<b>Virucidal</b>	<b>Staphylocidal</b>	<b>Pseudomonacidal</b>

**ACTIVE INGREDIENTS:**  
o-Benzyl-p-chlorophenol.....5.25%  
o-Phenylphenol.....0.99%  
Other Ingredients.....93.76%  
TOTAL.....100.00%

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

**First Aid**

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**If swallowed:** Call a poison control center immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact the Poison Control Center 1-800-222-1222 for emergency medical treatment information.

**SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

**Net Contents: \_\_\_\_\_**

**ISABEL CRISTINA  
THE PERFECT BLEND OF BEAUTY AND SCIENCE**

Manufactured by:

RBR Productions Inc.

P.O. BOX 766, Hartwell, GA 30643, USA

Tel: (800) 247-4130 • 706-376-8189

EPA Reg. No. 62296-1 EPA Est. No. 62296-GA-1

**LET'S TOUCH®**

LET'S TOUCH® is a hospital and tuberculocidal disinfectant concentrate especially formulated for the beauty care profession. It provides broad spectrum protection: bactericidal, fungicidal, virucidal, staphylocidal, pseudomonacidal, tuberculocidal, and prevents cross contamination from all metal salon instruments when used as directed. Use it to disinfect all pre-cleaned metal salon instruments including manicurist nippers and cuticle pushers, shears and metal skin care instruments. Let's Touch® does not rust or dull quality metal instruments, is pH buffered, and is biodegradable.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Before immersion in Let's Touch®, all instruments and devices must be thoroughly cleaned to remove excess dirt, rinsed and rough dried. The removal of heavy soils and the cleaning of all surfaces prior to application of this product is required. When using Let's Touch® for the first time, thoroughly clean and rinse trays and containers in order to remove any residues. Mixing Let's Touch® in a container which had another disinfectant in it can cause a brown gel-like substance to form. If this happens, thoroughly clean and rinse all contaminated instruments, trays or containers and remix Let's Touch®. Use one part Let's Touch® to 32 parts water for disinfection of pre-cleaned metal instruments and equipment. Let's Touch® is distributed in concentrated form in Twin-Neck containers and in 1 oz. [bottles][packets].

**DIRECTIONS FOR MIXING WITH [BOTTLES][PACKETS] AND TWIN-NECK CONTAINER**

Water	1 Pint (16 oz.)	1 Quart (32 oz.)	1/2 Gallon (64 oz.)	1 Gallon (128 oz.)
Let's Touch®	1/2 fl. oz.	1 fl. oz. or 1 [bottle][packet]	2 fl. oz. or 2 [bottles][packets]	4 fl. oz. or 4 [bottles][packets]

Always add 1 [bottle][packet] or 1 oz. of Let's Touch® to every 32 fl. oz. of water. When using the Twin-Neck container, squeeze the bottle until the easy-measure reservoir is filled to the desired amount.

**DIRECTIONS FOR MIXING WITH THE MANICURIST AND HAIR STYLIST SYSTEMS**

<p><b>Manicurist System</b></p> <ol style="list-style-type: none"> <li>1. Fill the tall plastic mixing jar to the 32 oz. Fill Line with water.</li> <li>2. Add 1 oz. of Let's Touch® [1 [Bottle][Packet]. Cap &amp; mix by turning upside down a few times.</li> <li>3. Pour the mixed solution into the glass manicurist jar to the suggested use level line.</li> <li>4. Store the remaining solution until needed.</li> </ol>	<p><b>Hairstylist System</b></p> <ol style="list-style-type: none"> <li>1. Remove the plunger mechanism.</li> <li>2. Fill the glass jar to the 32 oz. Fill Line with water.</li> <li>3. Add 1 oz. of Let's Touch® [1 [Bottle][Packet]. Mix solution by replacing plunger and moving it up and down.</li> </ol>
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Always leave instruments in Let's Touch® solution at all times and overnight for storage. Replace solution daily, or earlier if cloudy or dirty.

**FOR INSTRUMENT DISINFECTION:** After cleaning instruments, place articles in Lets Touch® solution for ten minutes.

**NOTE:** Articles must be fully submerged in solution at all times.

**FOR METAL INSTRUMENT STORAGE:** A solution of one part Let's Touch® to 32 parts water (see above for mixing instructions) does not rust or dull, and does not stain or otherwise attack metal instruments such as quality salon shears, manicurist and skin care implements. The solution may be used for prolonged (overnight) storage of all but non metal instruments, plastic or rubber items.

**LET'S TOUCH® IS A COMPLETE PRODUCT. DO NOT MIX WITH OTHER CHEMICALS.** Use only as directed. If frozen, thaw and remix before use.

Let's Touch® is recommended for use in salons, hospitals, dental offices or other facilities requiring disinfection of metal instruments.

**FOR HOSPITAL AND DENTAL OFFICE USE:** Let's Touch® is a concentrated disinfectant to be used at a 1:32 dilution with water for cold decontamination/disinfection of pre-cleaned equipment. For disinfection immerse instruments for 10 minutes.

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced with the bloodstream or normal sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection. The 1:32 dilution kills pathogenic bacteria and fungi such as S. Aureus, S. cholersuis, Ps. aeruginosa, M tuberculosis (effective in 10 minutes at 20° C), and C. albicans. Let's Touch® is virucidal against Influenza A2 (Hong Kong), Herpes Simplex 1 and 2, Adenovirus Type 2 and Vaccina on hard inanimate surfaces in 10 minutes at 20° C.

A 1:32 dilution is effective against M tuberculosis on hard, inanimate surfaces in 10 minutes at 20° C. Remove heavy soil or gross filth and thoroughly clean surfaces.

When tested by the EPA approved Dilution Method the HIV-1 (AIDS) virus was completely inactivated by a 1:32 solution in 10 minutes at 25° C.

**PRECAUTIONARY STATEMENTS  
HAZARD TO HUMANS AND DOMESTIC ANIMALS**

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Harmful if swallowed. Avoid prolonged skin contact. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

**STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Commercial Use:**

**PESTICIDE STORAGE:** Store only in original container away from heat or open flame. Keep container closed when not in use. Storage must be secured sufficiently to make product inaccessible to children or persons unfamiliar with its proper use. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER HANDLING - (For containers greater than 5 gallons):** Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

**(For containers equal to or less than 5 gallons):** Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

**Household / Residential Use:**

**CONTAINER HANDLING -** Nonrefillable container. Do not reuse or refill this container. Securely wrap original container in several layers of newspaper and discard in trash or offer for recycling if available.

**KILLS HIV (AIDS VIRUS) ON PRECLEANED ENVIRONMENTAL SURFACES/ OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS** in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS).

**SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV (AIDS VIRUS) OF SURFACES/OBJECTS SOILED WITH BLOOD AND BODY FLUIDS**

**Personal Protection:** Disposable latex or vinyl gloves, gowns, masks and/or eye coverings, as appropriate must be worn during all cleaning and decontamination procedures of blood and other body fluids.

**Cleaning Procedures:** Blood and other body fluids must be thoroughly cleaned from surfaces and objects before applying disinfectant.

**Disinfectant Use and Contact Time:** Effective against HIV-1 (AIDS virus) on hard non-porous surfaces/objects in the presence of organic soil (5% blood serum). Prepare disinfectant by mixing one part Let's Touch® to 32 parts water. Leave surfaces wet for 10 minutes.

**Disposal of Infectious Material:** Blood and other fluids should be autoclaved and disposed of according to Federal, State and local regulations for infectious waste disposal.

**ENVIRONMENTAL HAZARDS**

**(For containers 5 gallons or greater):** This pesticide is toxic to fish. Do not discharge effluent containing this product into lakes, ponds, streams, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**Batch No.:**

672155P8227.1304

MANICURIST SYSTEM BOX LABEL - (Optional box language)

METAL TOOL DISINFECTANT  
MANICURIST KIT

**NO RUST!!!**

**ISABEL CRISTINA**

# Let's Touch®

**HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT**

**DOES NOT RUST**

**DOES NOT DULL**

**STORES QUALITY METAL INSTRUMENTS OVERNIGHT**

**Bactericidal  
Virucidal**

**Fungicidal  
Staphylocidal**

**Tuberculocidal  
Pseudomonacidal**

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

**CONTENTS:**

- One Full Immersion Glass Instrument Jar with Stainless Steel Lid, Basket and Plunger for Easy Placement and Removal of Instruments
- One 32 oz. Solution Preparation and Storage Container with Leak Proof Cap
- Four 1 ounce Let's Touch® Disinfetant [Packets][Bottles] Makes 4 Quarts
- Client Awareness Card

**KEEP OUT OF REACH OF CHILDREN  
WARNING**

*See enclosed [packets][bottles] for additional precautionary statements.*

**ACTIVE INGREDIENTS:**

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

**ISABEL CRISTINA**

**THE PERFECT BLEND OF BEAUTY AND SCIENCE**

**Manufactured by:** RBR Productions, Inc.

P.O. BOX 766, Hartwell, GA 30643

Tel: (800) 247-4130 • 706-376-8189

STYLIST SYSTEM BOX LABEL - (Optional box language)

METAL TOOL DISINFECTANT  
STYLIST KIT

**NO RUST!!!**

**ISABEL CRISTINA**

# Let's Touch®

**HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT**

**DOES NOT RUST**

**DOES NOT DULL**

**STORES QUALITY METAL INSTRUMENTS OVERNIGHT**

**Bactericidal**

**Fungicidal**

**Tuberculocidal**

**Virucidal**

**Staphylocidal**

**Pseudomonacidal**

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

**CONTENTS:**

- One 32 oz. Full Immersion Glass Instrument Jar with Stainless Steel Lid, Basket and Plunger for Easy Placement and Removal of Instruments
- Ten 1 ounce Let's Touch® Disinfetant [Packets][Bottles] Makes 10 Quarts
- Client Awareness Card and Window Decal

**KEEP OUT OF REACH OF CHILDREN**

## **WARNING**

*See enclosed [packets][bottles] for additional precautionary statements.*

**ACTIVE INGREDIENTS:**

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

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P.O. BOX 766, Hartwell, GA 30643

Tel: (800) 247-4130 • 706-376-8189



BOX LABEL - (Optional box language)

DISINFECTANT REFILL [PACKETS][BOTTLES]

**NO RUST!!!**

**ISABEL CRISTINA**

# **LeT'sTouch®**

**HOSPITAL AND TUBERCULOCIDAL METAL SALON DISINFECTANT**

**DOES NOT RUST**

**DOES NOT DULL**

**STORES QUALITY METAL INSTRUMENTS OVERNIGHT**

**Bactericidal  
Virucidal**

**Fungicidal  
Staphylocidal**

**Tuberculocidal  
Pseudomonacidal**

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1

**KEEP OUT OF REACH OF CHILDREN**

## **WARNING**

*See enclosed [packets][bottles] for additional precautionary statements.*

**ACTIVE INGREDIENTS:**

o-Benzyl-p-chlorophenol.....	5.25%
o-Phenylphenol.....	0.99%
Other Ingredients.....	93.76%
TOTAL.....	100.00%

**CONTENTS: 12-1 Ounce [Packets][Bottles] (29.5 ml))**

**ISABEL CRISTINA**

**THE PERFECT BLEND OF BEAUTY AND SCIENCE**

**Manufactured by:** RBR Productions, Inc.

P.O. BOX 766, Hartwell, GA 30643

Tel: (800) 247-4130 • 706-376-8189

(Included in kits) SALON WINDOW DECAL FOR LET'S TOUCH® DISINFECTANT - (Optional language)

**THIS SALON DISINFECTS  
QUALITY METAL INSTRUMENTS WITH  
**LeT'sTouch®**  
DISINFECTANT**

*ISABEL CRISTINA*  
*the perfect blend of beauty and science*

**Hospital & Tuberculocidal Disinfection  
In 10 Minutes**

EPA Reg. No. 62296-1

EPA Est. No. 62296-GA-1