

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Georgia Anastasiou Agent for Handstands America Covers DBA Handstands c/o Lewis & Harrison 122 C Street NW, Suite 505 Washington DC, 20001

SUBJECT:

Handstands Cleaner Spray

EPA Registration Number: 89174-1 Application Date: July 16, 2014 Receipt Date: July 17, 2014 AUG 5 2014

Dear Ms. Anastasiou:

This letter acknowledges receipt of the notification identified above submitted under provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) as amended and PR Notice 98-10.

To update non-FIFRA marketing language

Based on a review of the submitted information, this notification is acceptable. Your proposed change will be made part of the record for this file.

#### **General Comments**

Should you have any questions concerning this letter, please contact Tracy Lantz at (703) 308-6415 or Velma Noble at (703) 308-6233.

Sincerely,

Nelma Noble

Product Manager (31)

Regulatory Management Branch I Antimicrobials Division (7510P)

Please read instructions on reverse before comng form.	Form Approv. JMB No. 2070-	2/ 0060, Approval expires 05-31-98					
United States	☐ Registration	OPP Identifier Number					
EPA Environmental Protection							
Washington, DC 204	ien						
	\alpha Other						
Application	on for Pesticide - Section I						
1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification					
89174-1	Velma Noble	None Restricted					
4. Company/Product (Name)	PM#	Motte Tivestricted					
Handstands Cleaner Spray	31						
5. Name and Address of Applicant (Include ZIP Code)	6. Expedited Review. In accordance wit						
America Covers DBA Handstands c/o Lewis & Harrison, LLC	(b)(l), my product is similar or identical in composition and labeling						
122 C Street, Suite 505	to:						
Washington, DC 20001	EPA Reg. No	<del></del>					
Check if this is a new address	Product Name						
Section - II							
Amendment Evalein helew	Final printed labels in recognize to	Agangy letter dated					
Amendment - Explain below.  Resubmission in response to Agency letter dated	Final printed labels in response to  "Me Too" Application	Agency letter dated					
Notification - Explain below.	Other - Explain below	•					
Explanation: Use additional page(s) if necessary.							
	rketing language. Please read cover lette	r for details.					
Notification in Accordance With PR Notice 98-10 This notification i	is consistent with the provisions of PR Notice 98-10 EPA re	gulations at 40 CFR 152.46, and no					
other changes have been made to the labeling or the confidential sta willfully make any false statement to EPA. I further understand that							
	e subject to enforcement action and penalties under sections						
Section – III							
Material This Product Will Be Packaged In:     Child-Resistant Packaging Unit Packaging	Water Soluble Packaging	2 Type of Container					
Material This Product Will Be Packaged In:  Child-Resistant Packaging  Unit Packaging  Yes*  Yes  Yes	Water Soluble Packaging Yes	2. Type of Container  Metal					
Child-Resistant Packaging Unit Packaging							
Child-Resistant Packaging  Yes*  No  If "Yes"	☐ Yes ☐ No No. per If "Yes" No. per	Metal					
Child-Resistant Packaging  Yes*  No  Unit Packaging  Yes  No	Yes No	Metal Plastic					
Child-Resistant Packaging  Yes*  No  If "Yes"  Unit Packaging  Yes  Init Packaging wat	☐ Yes ☐ No No. per If "Yes" No. per	Metal Plastic Glass					
Child-Resistant Packaging  Yes* No No If "Yes" Unit Packaging Yes No If "Yes" Unit Packaging Yes Unit Packaging Ves Unit Packaging Ves Ves No If "Yes" Unit Packaging wgt.	No. per If "Yes" No. per container Package wgt.	Metal Plastic Glass Paper					
Child-Resistant Packaging  Yes* No No If "Yes" Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per If "Yes" No. per container Package wgt. Container  Setail Container 5. Location On Label	Metal Plastic Glass Paper Other (Specify) of Label Directions					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Unit Packaging Yes No  If "Yes" Unit Packaging wgt.  4. Size(s) Residuation Container	Yes No No. per If "Yes" Container  Package wgt.  No. per container  Package wgt.  State of the container  On Label On labeling	Metal Plastic Glass Paper Other (Specify) of Label Directions					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  Unit Packaging Yes Unit Packaging wgt.  4. Size(s) Residuation Container  6. Manner in Which Label is Affixed to Product Lithogra	Ves No. per	Metal Plastic Glass Paper Other (Specify) of Label Directions					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Unit Packaging Yes No  If "Yes" Unit Packaging wgt.  4. Size(s) Residuation Container	Ves No. per If "Yes" Container Package wgt.  No. per container  Package wgt.  State of the container  On Labeling of the container  On labeling of the container  On labeling of the container	Metal Plastic Glass Paper Other (Specify) of Label Directions					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  6. Manner in Which Label is Affixed to Product  Unit Packaging Yes No If "Yes" Unit Packaging wgt.  4. Size(s) Residue to Product Lithogram Paper of Paper	Ves No. per If "Yes" Container Package wgt.  No. per container  Package wgt.  State of the container  On Labeling of the container  On labeling of the container  On labeling of the container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  4. Size(s) Ro  Container  6. Manner in Which Label is Affixed to Product Paper of Stencile	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  CCCC CCCC CCCC CCCC CCCC CCCC CCCC					
Child-Resistant Packaging  Yes* No No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification)	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  ccc ccc this application) cccccc elephone No. (include Area Code)					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification)	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  ccc this application) ccccc					
Child-Resistant Packaging  Yes* No No If "Yes" Unit Packaging Yes No If "Yes" Unit Packaging wgt.  *Certification must be submitted  3. Location of Net Contents Information Label Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification) Name Georgia Anastasiou - Lewis & Harrison, LLC  Certification I certify that the statements I have made on this form and all attatacknowledge that any knowingly false or misleading statement in	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  this application) c elephone No. (include Area Code) 202-393-9903 ext, 19					
Child-Resistant Packaging  Yes* No If "Yes" Unit Packaging wgt.  *Certification must be submitted  3. Location of Net Contents Information Label Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification) Name Georgia Anastasiou - Lewis & Harrison, LLC  Certification I certify that the statements I have made on this form and all attatacknowledge that any knowingly false or misleading statement in under applicable law.	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  this application) elephone No. (Include Area Code) 202-393-3903 ext, 19 Caceived (Stamped)					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification) Name Georgia Anastasiou - Lewis & Harrison, LLC  Certification I certify that the statements I have made on this form and all atta acknowledge that any knowingly false or misleading statement in under applicable law.  2. Signature  9	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  accompanying product  this application) elephone No. (include Area Code) 20/2-393-9903 ext. 19 6. Date Application Received					
Child-Resistant Packaging  Yes* No  *Certification must be submitted  3. Location of Net Contents Information Label  Container  6. Manner in Which Label is Affixed to Product Paper of Stencile  1. Contact Point (Complete items directly below for identification) Name Georgia Anastasiou - Lewis & Harrison, LLC  Certification I certify that the statements I have made on this form and all attated acknowledge that any knowingly false or misleading statement in under applicable law.  2. Signature  3. Signature	No. per container	Metal Plastic Glass Paper Other (Specify) of Label Directions  ag accompanying product  this application) elephone No. (Include Area Code) 202-393-3903 ext, 19 Caceived (Stamped)					

# LEWIS & HARRISON

122 C Street, N.W., Suite 505 Washington, D.C. 20001

telephone 202,393,3903 fax 202,393,3906

Consultants in Government Affairs

July 16, 2014

HAND DELIVERED

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

ATTENTION:

Velma Noble

**Product Manager (31)** 

SUBJECT:

**America Covers DBA Handstands** 

Handstands Cleaner Spray (EPA Reg. No. 89174-1) Notification in accordance with PR Notice 98-10

Dear Ms. Noble:

On behalf of Handstands, I am submitting a notification for the product **Handstands Cleaner Spray** (EPA Reg. No. 89174-1). The purpose of this notification is add the following non-FIFRA marketing language:

"(Also) (Find our other products) (Look for our other products), (Try our other products)"

"Available in (Clean), (Protect), (Detail) and (Leather) (for your car)"

"Available in matte and (or) shine finishes in a variety of (fresh) (scents) (fragrances)"

In support of this submission enclosed please find the following documents:

- 1) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- 2) One (1) copy of the label with changes highlighted; and,
- 3) Two (2) copies of the revised label.

f you have any questions about this submission, please contact me at (202) 393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,

Georgia Anastasiou
Agent for,

Handstands

# Master Label

# **Handstands Cleaner Spray**

ACTIVE INGREDIE		imathul banzul ammar	sium ablanida	0.240/	
Alkyl (C <sub>14</sub> 60%,C <sub>16</sub> 30%,C <sub>18</sub> 5%,C <sub>12</sub> 5%) dimethyl benzyl ammonium chloride Alkyl (C <sub>12</sub> 68%,C <sub>14</sub> 32) dimethyl ethylbenzyl ammonium chloride OTHER INGREDIENTS:			0.31% 0.31% 99.38%		
			100.00%		
KEEP OUT OF REA CAUTION See [back] [side] pa	ACH OF CHILDREN  nel for additional precautior	nary statements.			
NET CONTENTS:	(1 PT) ( Pint) ( Fluid Ounces) ( milliliter)	(16 FL OZ) ( PT) ( FL OZ) ( mL)	(473 mL) ( pt) ( oz) ( ml)		
Brand Logo EPA Reg. No.: EPA Est. No.:	- 89174 <b>-</b> 1				
Beginning of batch of	code indicates EPA Est. No		NOTIFIC	ATION IKI	
U.S. Patent(s) (pend and other patents pe	ding) -or- (insert numbers)_ ending		Dete Roviewed Reviewed By:	nay Laut 2	;
Package shape and	configuration Trademarked	i.			
[See (bottom) or (ca	p) (for Lot / Date Code)]			Asset San	
(Container) (Bottle)	made of ()		. :		
Questions? (symbol	l of telephone) (Call:) (1-87	77-HANDSTANDS) o	(1-801-727-13	300)	
[For ingredient (and www.RefreshYourCa	other) information, (please ar.com	visit us at) (visit) (web			1 () ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (
© HandStands® All	•			666 C C C	
102 West 12200 Sou Made in [country] (ye	uth, Draper, Utah 84020 U. ear)	S.A.	•		
(Company graphic lo	•				
[Important: For direct	ctions for use in Spanish, p	lease call xxx-xxx-xxx	x]		

## Introductory CLAIM - will only appear on marketing label for the first 6 months

New

#### **Optional Fragrance Claims**

Pacific Rain Scent

(Fresh), (Clean), (Citrus) (Center) (Bold)

derived from (bergamot) and (eucalyptus), grounded with a base

of (oak) (moss) and (water) (hyacinth)

Hawaiian Sunrise Scent

(Vibrant) (Tropical) (Bouquet)

(primary) (notes) of (island) (coconut) and (ripe) (banana) are (combined) with a (center) of (exotic) (tropical) (fruits) (finished)

with a (subtle) (vanilla) (base) (fresh)

**New Car Scent** 

(Fresh), (Fougere), (Musk) (Clean)

(top) (notes) - (citrus), (melon), (leafy green);

(middle) (notes) – (lavandin), (muguet), (rosemary), (apple) (bottom) (notes) – (musk), (amber), (woody), (orange), (flower)

Clean, (Fresh) Fragrance Clean(er) Smelling Scent

[Fragrance Name] has a (Clean) (Scent) (Fragrance) (Smell)

(Leaves) a (Freshness) (Light) (Clean) (Fresh) (Inspired) (Scent) (Fragrance) (Smell) (All

Around) (In the Car)

Does Not Just (Cover Up) (Mask) Odors, (this Product) Eliminates them at the Source Leaving Behind a (Light) (Pleasant) (Fresh) Scent

### Optional Packaging Claims - use as bullet point or in paragraph format

(Bonus), (Bonus x%), (Mega), (Super)

(Value) (Pack), (Size), (Bottle), (Container)

(To Go), (Portable)

Try (Me) Now

Try (Me) Today

(Free) (Bonus) (Auto Air Freshener), (Limited Time)

Look for other Refresh Your Car® Products Wherever Auto Air Fresheners are Sold

(Easy) (Smooth) (Spray) (Trigger) (Handle)

(Even) (Flow) (Fluid)

**Bottle** 

Container

Spray

Fragrance:

) Scent

(New Car) Scent

(Pacific Rain) Scent

(Hawaiian Sunrise) Scent

#### Optional Marketing / Claims

Refresh [Automotive] [Your Car] [Antibacterial] [Cleaning] Spray

Refresh [Automotive] [Your Car] [Cleaning] Spray

Antibacterial\*, Antibacterial\* Action, Bacteria\*

Clean, Cleans, Cleaning, Cleaner

Detail, Detailer, Details

Protect, Protects, Protectant, Protecting

Condition, Conditions, Conditioner, Conditioning

Deodorize, Deodorizes

Scent, Scents, Smell, Smells, Smelling, Fragrance, Aroma, Pleasant

Effective, Effectively, Effortlessly, Fast, Fresh, Great, Maximum, Quick, Quickly

Degrease, Degreaser, Dissolves,

Built, Designed to Pick Up, Strong, Strength, Tough

Matte Finish

Cleans and Protects, Cleans and Renews [Your Car]

Removes Dust, Dirt and Grime, Cleans and Conditions

For General Cleaning and Sanitizing

Good for Everyday Cleaning, Touch-Ups and Messes

Excellent for Quick Clean Ups, Touch Up Cleaning

Fast, Convenient Way to Clean and Protect Interior Auto Surfaces

(This Product) is the Quick Convenient Way to Clean and Sanitize

Cuts through (Dirt), (Dust), (Grime)

(This Product) (Quickly) (Removes) (Picks Up) (Debris) (Dust)

Effective Against (Bacteria)\*

Bacteria \*(Killer)

Dye Free (Formula) (Technology)

Complete (Formula)

New (Fragrance) (Scent) (Spray) (Trigger) (Design)

New (Easy) (Spray) (Trigger) (Handle)

For a Clean Car

[Is the] One-Step Solution to Clean and Protect the Interior of your Vehicle

Kills the Bacteria\* that Cause Nasty Odors

Leaves your Car Clean and Smelling Like New

Rid your Car of (Odor Causing) Bacteria\*

Helps Eliminate Odor-Causing Bacteria\*

(Neutralizes), (Eliminates), (Kills) (Odors from)(Odor Causing Bacteria\*) (while leaving a <scent descriptor listed on page 2> scent)

(Does Not) (Doesn't Just) Mask Odors (Instead) (Eliminates) (Odors) at the Source

This Product has Cleaning Power

Cleans Vinyl, Plastic, Upholstery, Cloth, Carpet, Aluminum, Stainless Steel, Rubber (This Product) Eliminates Odors and Kills (99.9% of) (Odor Causing) Bacteria\* on (Automotive) (Auto) (Car) (Surfaces) (at the Source) to Freshen up your Car

\* Kills Staphylococcus Aureus (Staph), Enterobacter Aerogenes

Handstands Cleaner Spray EPA Label 7-16-2014

#### Optional Marketing / Claims- continued

(Controls) (Kills) (Neutralizes) (Eliminates) (the Toughest) (Tough) Odor-Causing Bacteria\* (Protectants) to help (Prolong) (Extend) the (Life) of Your Car's Interior Provides white cleansing action

Looking Like New

All-in-1, Complete, Easy to Use, Quick & Easy, Ready to Use, Specially Formulated Engineered Formula Specifically Designed to Clean, Protect, and Revitalize Hard Non-Porous Surfaces In Your Vehicle.

Restores and Protects Your Vehicle's Original Appearance, Leaving No Residue Multi-Action, Multi-Clean, Multi-Purpose, Multi-Surface, Streak-Free, Ultra, Action, Versatile UV Blockers, Maximum Cleaning Power, Protect Against Drying, Cracking, Fading, and Pre-Mature Aging,

Prevents Drying and Cracking from the Sun's Harmful Rays

Non-greasy, Won't Damage, or Fade Automotive Surfaces, Safe

[and] Won't Dry Out, Damage, or Fade Automotive Surfaces

Wipes Your Messy Car Troubles Away

(Does Not) (Will Not) (No) (Scratch)(ing) (Your Surface), (No Sticky Residue)

Effectively Works on (Many) (Most) (Hard Non-Porous) (Surfaces)

Quick, Easy, Fast, Quickly

Leaves No Residue (Streak Free)

An Efficient Way to Clean

Cleans (and) (Sanitizes) (Eliminates Odors) (All-in-One!)

Cleans and Smells (Well) (Great) (Fantastic) (Pleasant)

Deep Clean

Leaves your Car (Clean) (Shiny) (Fresh)

No (Sticky) (Tacky) (Residue) (Film)

Easy Open

Easy to Carry Around

**Economy Size** 

Extra Value at No Extra Cost

Mega Value (Pack) (Size)

Mega Value Size

(This (cleaning) (solution) (product))

(Also) (Find our other products) (Look for our other products), (Try our other products)

Available in (Clean), (Protect), (Detail) and (Leather) (for your car)

Available in matte and (or) shine finishes in a variety of (fresh) (scents) (fragrances)

<sup>\*</sup> Kills Staphylococcus Aureus (Staph), Enterobacter Aerogenes

#### **Optional Antibacterial Claims**

(Kills) (Eliminates) 99.9% of Bacteria\* (in 30 Seconds)

(Kills) (Eliminates) 99.9% of (Staphylococcus Aureus) (Staph) (in 30 Seconds)

(Kills) (Eliminates) 99.9% of (Enterobacter Aerogenes) (in 30 Seconds)

Effective to (Kill) (Sanitize) 99.9% of Bacteria\* (in 30 Seconds)

(Effective) (Sanitizer) for Use in the Interior of your (Car) (Automobile): Dashboard, Door Handles, Cup Holders

The [Quick and] Easy Way to Clean and Sanitize: Dashboard, Door Handles, Cup Holders (and other hard non-porous surfaces).

[The [Quick and] Easy Way to Clean and Sanitize the [Following Surfaces:]] Vinyl, Plastic, Aluminum, Stainless Steel, Rubber

[Use on the Following (Places) (Surfaces)] (Hard Non-Porous Surfaces), Vinyl, Plastic, Aluminum, Stainless Steel, Rubber

#### **Use Directions**

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using this product.

#### For Spray Bottle Packaging:

- (1) Shake well. Turn nozzle to ("ON") (or) ("spray icon") position.
- (2) Apply to a clean cloth and cover (entire) surface to be cleaned in a circular motion.
- (3) To sanitize, (use enough cleaner to thoroughly wet surface (6-8 pumps)) **-or-** (surface must remain visibly wet (6-8 pumps)) for 30 seconds, (then wipe off any excess solution) **-or-** ( then allow surface to air dry).
- (4) Apply as needed to maintain superior appearance and protection. **-or-**

To Clean:

Spray (cleaner) (protectant) onto surface and

To Sanitize:

Use enough (liquid) (cleaner) (protectant) (6-8 pumps) to thoroughly wet surface. Surface must remain (visibly) wet for 30 seconds (the entire contact time), (then wipe off any excess solution) (allow surface to air dry). Apply as needed to a nee

maintain superior appearance and protection.

USE ONLY AS DIRECTED: The [quick and] easy way to clean and sanitize [the interior of your car] [hard non-porous surfaces,] [ plastic(s),] [vinyl,] [aluminum,] [stainless steel] [and] [rubber]

<sup>\*</sup> Kills Staphylococcus Aureus (Staph), Enterobacter Aerogenes

#### **Optional Advisory Statements**

Not for cleaning or sanitizing skin.

Do not use (this product) on (eating/cooking utensils, glasses, dishes, utensils).

Not recommended for use on (glass,) (unfinished) (unsealed) (bare) (unsealed) (surfaces) (or around oxidizing agents).

Do not use on suede.

Test in (a small) [an] inconspicuous area prior to use.

Do not use around oxidizing agents.

Not for use on floors, vehicle controls (pedals, grips, steering wheels), bench, cycle tires, brake drums and other surfaces where slipperiness may be hazardous.

Do not use on or near clear plastic surfaces, glass (may cause smearing), fabric, woven materials or paint.

Do not use on surfaces where a slick or glossy finish is not desired.

#### **Precautionary Statements**

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco our using the toilet.

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 eye. Call poison control center for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

#### STORAGE AND DISPOSAL:

**Storage:** Store unopened package in a cool, dry place in areas inaccessible to small children. [(Turn) (Switch) (nozzle) (knob) to "OFF" between uses to retain moisture.] **Disposal and Container Handling:** Non-refillable container. Do not reuse or refill this container. Wrap and discard in trash or offer for recycling if available.

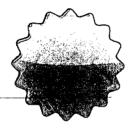
#### [Warranty Statement

100% Satisfaction Guaranteed or Your Money Back. Refresh Your Car guarantees it's products will meet or exceed your highest standards. If you are unsatisfied for any reason, contactives for a full refund.]

#### **Optional Images:**











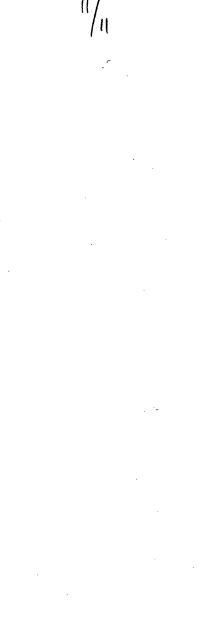


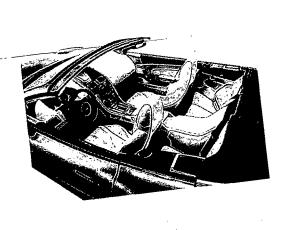




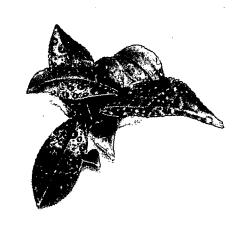


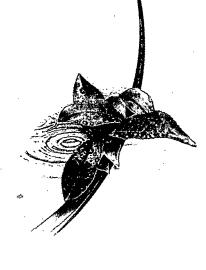
Handstands Cleaner Spray EPA Label 7-16-2014











Handstands Cleaner Spray EPA Label 7-16-2014