

89174-2

6/20/2014

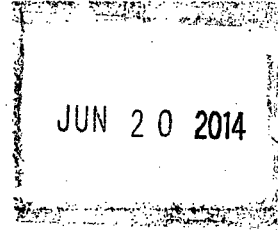
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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 Wipes
EPA Registration Number: 89174-2
Application Date: May 22, 2014
Receipt Date: May 23, 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 add Storage and Disposal language for product sold in a pouch container.
- To make minor edits to the instructions for opening and closing the pouch container.

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,

Tracy Lantz
for

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510P)



United States
Environmental Protection Agency
 Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

| | | |
|---|--|---|
| 1. Company/Product Number 89174-2 | 2. EPA Product Manager Velma Noble | 3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name) Handstands Cleaner Wipes | PM# 31 | |
| 5. Name and Address of Applicant (Include ZIP Code) America Covers DBA Handstands c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001 <input 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

- Amendment - Explain below.
- Final printed labels in response to Agency letter dated _____
- Resubmission in response to Agency letter dated _____
- "Me Too" Application
- Notification - Explain below.
- Other - Explain below

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

Notification to make minor changes. Please read cover letter for details.

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of 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 this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

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

Section - IV

| | | |
|--|---|--|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application) | | |
| Name Georgia Anastasiou - Lewis & Harrison, LLC | Title Agent for Handstands | Telephone No. (Include Area Code) 202-393-3903 ext. 19 |
| 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 (Stamped) |
| 2. Signature | 3. Title Agent for Handstands | |
| 4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC | 5. Date May 22, 2014 | |

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LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001
telephone 202.393.3903
fax 202.393.3906

May 22, 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: American Covers DBA Handstands
Handstands Cleaner Wipes (EPA Reg. No. 89174-2)
Notification**

Dear Ms. Noble:

On behalf of Handstands, I am submitting a notification for the product **Handstands Cleaner Wipes (EPA Reg. No. 89174-2)**. The purpose of this notification is to make the following changes:

- 1) Add Storage and Disposal language for product sold in a pouch container. Please note the language is in accordance with PR Notice 2007-4 and is similar to the canister language that was previously approved. The only difference with the language is the subheadings have been removed since they are not required because the product is sold to customers for personal automotive use and it has been edited so the word "pouch" is used.
- 2) Make minor edits to the instructions for opening and closing the pouch container.

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

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

If 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

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Master Label

Handstands Cleaner Wipes

ACTIVE INGREDIENTS:

Alkyl (C14 60%, C16 30%, C18 5%, C12 5%) dimethyl benzyl ammonium chloride 0.31%
Alkyl (C12 68%, C14 32) dimethyl ethylbenzyl ammonium chloride 0.31%

OTHER INGREDIENTS:

99.38%

TOTAL:

100.00%†

† does not include weight of dry wipe.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [back] [side] panel for additional precautionary statements.

[NET CONTENTS:]

Table with 3 columns: (___ count), (___ ct), (___ sheets). Rows include 15, 25, 35, and 50 counts/ct/sheets.

NOTIFICATION
Date Reviewed: 06/20/20
Reviewed By: Tracy Lan

Table with 3 columns: (___ x ___) inches, (___" x ___"), (___ cm x ___ cm). Row includes 7 x 8 inches, 7" x 8", 17.7cm x 20.3cm.

Includes weight of absorbent [wipe] (___ oz.) (___LB. ___OZ) (___g)

Brand Logo

EPA Reg. No.: 89174-2
EPA Est. No.:
U.S. Patent(s) (pending) -or- (insert numbers)
Beginning of batch code indicates EPA Est. No.
U.S. Patent(s) (pending) -or- (insert numbers)

and other patents pending

Package shape and configuration Trademarked.

[See (bottom) or (cap) (for Lot / Date Code)]

Questions? (symbol of telephone) (Call:) (1-877-HANDSTANDS) or (1-801-727-1300)

[For ingredient (and other) information, (please visit us at) (visit) (website)]

www.RefreshYourCar.com

© HandStands® All Rights Reserved
102 West 12200 South, Draper, Utah 84020 U.S.A.
Made in [country] (year)
(Company graphic logo)

(Important: For directions for use in Spanish, please call xxx-xxx-xxxx.)

Introductory CLAIMS – 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)

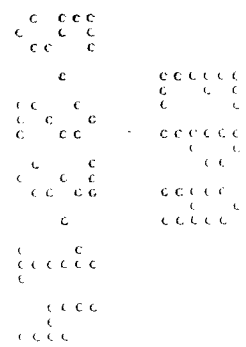
Hawaiian Sunrise Scent (Vibrant) (Tropical) (Bouquet)
(primary) (notes) of (island) (coconut) and (ripe) (banana) are
(combined) with a (center) of (exotic) (tropical) (fruits) (finished)
with a (subtle) (vanilla) (base) (fresh)

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

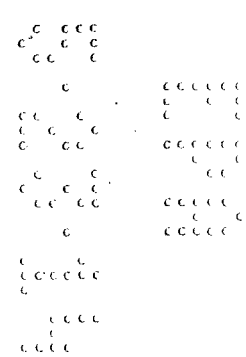
(Bonus), (Bonus x%), (Mega), (Super)
(Value) (Pack), (Size), (Canister)
(Convenient), (Easy), (Open), (Dispense)
(More) (Value), (On the Go), (Pack), (Pull) (Up) (Here), (Pop) (Up) (Cap),
(To Go), (Portable)
Try (Me) Now
Try (Me) Today
(Free) (Bonus) (Auto Air Freshener), (Limited Time)
Look for other Refresh Your Car® Products Wherever Auto Air Fresheners are Sold



| | | | | |
|---------------|--------------------------|-----------------|----------------------|---------------|
| Container | Canister | Count | Wet Cloths | Pre-Moistened |
| Mini Canister | Can | Wet Wipes | Pack | Roll |
| Pouch | Towelettes | Package | Box | |
| Fragrance: | () Scent | (New Car) Scent | (Pacific Rain) Scent | |
| | (Hawaiian Sunrise) Scent | | | |

Optional Marketing / Claims

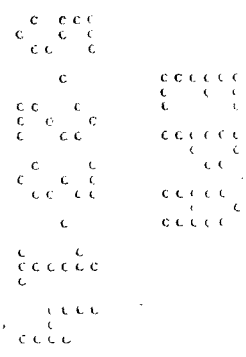
Refresh [Automotive] [Your Car] Antibacterial* Wipe(s)
 Refresh [Automotive] [Your Car] Cleaning Wipe(s)
 Antibacterial*, Antibacterial* Action, Bacteria*
 Clean, Cleans, Cleaning, Cleaner
 Detail, Detailer, Details
 Protect, Protects, Protectant, Protecting
 Deodorize, Deodorizer, Deodorizes
 Scent, Scents, Smell, Smells, Smelling, Fragrance, Aroma, Pleasant
 Effective, Effectively, Effortlessly, , Fresh, Great, Maximum,
 Degrease, Degreaser, Dissolves, Penetrates, Removes
 Cloth, Cloths, Wipe, Wipes, Weave, Textured, Pattern, Fiber, Strong, Interlocking
 Durable, Non-Woven Material, Cloth, Wipe, Textured
 Built, Designed to Pick Up, Strong, Strength, Tough
 Matte Finish
 Cleans and Protects, Cleans and Renews [Your Car]
 Removes Dust, Cleans and Conditions
 For General Cleaning and Sanitizing
 Good for Everyday Cleaning, Touch-Ups and Messes
 Excellent for Quick Clean Ups, Touch Up Cleaning
 Convenient Way to Clean and Protect Interior Auto Surfaces
 (This Product) is the Convenient Way to Clean Cuts through Dust
 (This Product) (Removes) (Picks Up) (Debris) (Dust)
 Each Pre-Moistened, Disposable Wipe is Treated with a Special Agent that Kills the Bacteria*
 that Causes Odors
 Effective Against Bacteria*
 Bacteria* (Killer)
 Dye Free (Formula) (Technology)
 Complete (Formula)
 New (Fragrance) (Scent) (Wipes) (Design)
 New (Easy Access) Lid
 For a Clean Car
 [[Is] [Are] 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*
 And Protect (You) (Your Family) from Bacteria*
 Helps Eliminate Odor-Causing Bacteria*
 (Neutralizes), (Eliminates), (Kills) (Odors from) (Odor Causing Bacteria*) (while leaving a
 <scent descriptor listed on page 2> scent)



*Kills Staphylococcus Aureus (Staph) and Enterobacter Aerogenes)

Optional Marketing / Claims- continued

(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
 (Controls) (Kills) (Neutralizes) (Eliminates) (the Toughest) (Tough) Odor-Causing Bacteria*
 (Each) (Wipe) Contains (Proven) Bacteria*-Killing (Ingredients)
 (Bacteria)* (Free) and Looking Like New
 Provides white cleansing action
 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
 Non-abrasive Wipe, Non Scratch Wipe
 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, Lint Free Cloth, Non-Abrasive, 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)
 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) (Fresh)
 No (Sticky) (Tacky) (Residue) (Film)
 Dispenses One (Wipe) (Cloth) at a Time
 Easy Open
 Easy to Carry Around
 Economy Size
 Extra Value at No Extra Cost
 Mega Value (Pack) (Size)
 Mega Value Size
 These convenient disposable wipes
 This (cleaning) (product))



*Kills Staphylococcus Aureus (Staph) and Enterobacter Aerogenes)

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Optional Antibacterial Claims

(Kills) (Eliminates) 99.9% of Bacteria* (in 60 Seconds)

(Kills) (Eliminates) 99.9% of (Staphylococcus Aureus) (Staph) (in 60 Seconds)

(Kills) (Eliminates) 99.9% of (Enterobacter Aerogenes) (in 60 Seconds)

Effective to (Kill) (Sanitize) 99.9% of Bacteria* (in 60 Seconds)

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

The Easy Way to Clean and Sanitize: Dashboard, DoorHandles, Cup Holders (and other hard non-porous surfaces).

[The 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 Canister Packaging:

(1) Remove top lid and (protective) inner seal. [Open (cap) (lid) and (pull up firmly) on (lid to remove) the (entire) cap (from the canister)]. (Locate wipe at the center of roll).

Pull (cloth) (wipe) (sheet) (from the center of the roll) (up and slightly to the side) (and feed it through the front).

[Lift the front lid for small clean-up needs, or open the entire lid for easier access]

For Pouch Packaging:

(1) Peel back the front label slowly. Remove (cloth) (wipe) (as needed). ~~(and)~~ (4) Reseal pouch to avoid moisture loss. ~~Reseal (pouch) (package)~~ (by firmly running thumb over label).

Cleaning/Sanitizing Directions:

(2) Apply in a circular motion covering (entire) surface to be cleaned.

(3) To sanitize, use as many wipes as necessary to (thoroughly) wet surface for 60 seconds. Surface must remain wet for the entire contact time, then allow to air dry.

-or-

To Clean: Use fresh (wipe) (cloth) on surface.

To Sanitize: Use as many fresh (wipes) (cloths) as necessary to thoroughly wet surface. Surface must remain wet for the entire contact time. Allow to remain wet for 60 seconds. Allow surface to air dry.

(4) When finished, (always) (snap) (close) lid securely to (retain) (moisture) (between uses to) (prevent) (retain) (moisture) (loss).

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

*Kills Staphylococcus Aureus (Staph) and Enterobacter Aerogenes)

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Optional Advisory Statements

Do not use as a diaper wipe or for personal (use) – or – not for use as a personal wipe
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.)
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 suede
Test in (a small) [an] inconspicuous area prior to use
Do not use around oxidizing agents
Do not flush (in toilet)
Do not use on or near clear plastic surfaces, glass (may cause smearing), fabric, woven materials or paint.
Do not use as a diaper or personal wipe.
Not for cleaning or sanitizing skin.

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 or 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 you call a poison control center or doctor or going for treatment.

For Canister Packaging:

STORAGE AND DISPOSAL: **Storage:** Store unopened package in a cool, dry place in areas inaccessible to small children. Dispose of (wipe) (cloth) in trash after use. Do not flush. (Reseal) (Close) lid securely between uses to retain moisture. **Disposal and Container Handling:** Non-refillable container. Do not reuse or refill this container. Discard in trash or recycle.

For Pouch Packaging:

STORAGE AND DISPOSAL: Store unopened package in a cool, dry place in areas inaccessible to small children. Dispose of wipe in trash after use. Do not flush. Reseal pouch to retain moisture. Non-refillable container. Do not reuse or refill this container. Discard in trash or recycle.

[Warranty Statement

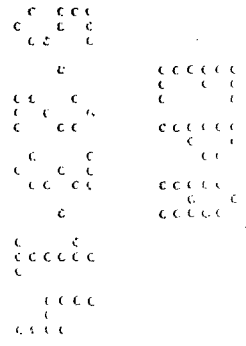
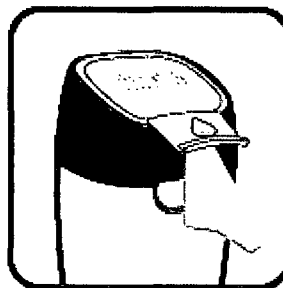
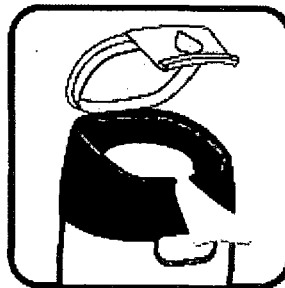
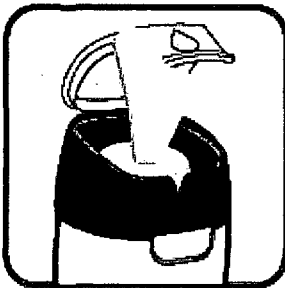
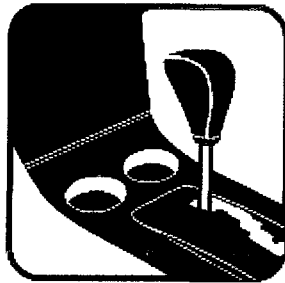
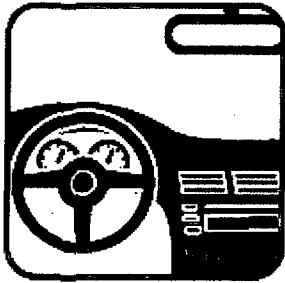
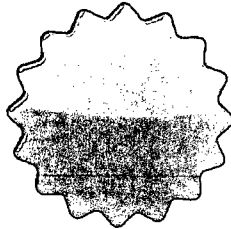
100% Satisfaction Guaranteed or Your Money Back. Refresh Your Car guarantees it's products will meet or exceed your highest standards. If you are unsatisfied for any reason, contact us for a full refund.]

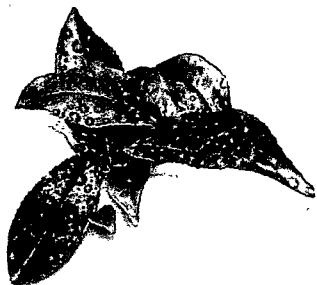
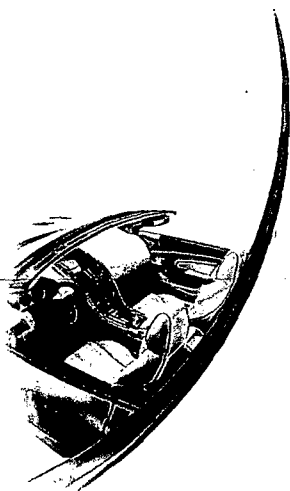
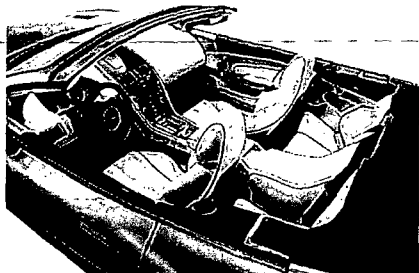
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Optional Images:

Refresh

your car!





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