

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Georgia Anastasiou Agent for Handstands America Covers DBA Handstants c/o Lewis & Harrison, LLC 112 C Street, Suite 505 Washington, DC 20001

MAR 13 2014

SUBJECT:

Handstand High Shine Protectant Wipes

EPA Registration Number: 89174-4 Application Dated: March 03, 2014 Receipt Date: March 06, 2014

Dear Ms. Britton:

This letter acknowledges receipt of the notification identified above submitted under the provisions of section 3 (c) 9 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended and PR Notice 98-10 and 40 CFR 152.46.

• As per your request for the addition of alternate brand names "Antibacterial Protect Your Car Refresh Your Car Automotive Cleaning Wipes, Antibacterial Leather Refresh Your Car Automotive Cleaning Wipes", and minor labeling changes.

General Comments

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

Should you have any questions concerning this letter, please contact John Cowden at (703) 347-0259 or Velma Noble at (703) 308-6233.

Sincerely

Velma Noble

Product Manager (31)

Regulatory Management Branch I

EPA Environmen	Jnited States Ital Protection A ington, DC 20460	•	☐ Registr ☐ Amend ☑ Other	ation	OPP Identifier Number			
Application for Pesticide - Section I								
1. Company/Product Number 89174-4		2. EPA Product I Velma Noble	Manager		3. Proposed Classification None Restricted			
4. Company/Product (Name) Handstands High Shine Protectant W	_ ·	PM# 31						
5. Name and Address of Applicant (Include ZIP C America Covers DBA Handstands c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001	ode) 6	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. Resubmission in response to Agency letter dated "Me Too" Application Notification - Explain below. Explanation: Use additional page(s) if necessary. (For Section I and Section II.) Notification to add Additional Brand Names, add Non-FIFRA related language and make minor revisions to the marketing language 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.CSec-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								
Material This Product Will Be Packaged In:			· · · · · · · · · · · · · · · · · · ·					
Child-Resistant Packaging Yes* No If "Yes"	O No.	per If "Y	er Soluble Pack Yes No es" kage wgt.	No. per container	2. Type of Container Metal Plastic Glass			
be submitted		· ·	•		Paper Other (Specify)			
3. Location of Net Contents Information Label Container	4. Size(s) Retail	Container		On Label	f Label Directions			
Manner in Which Label is Affixed to Product	☐ Lithograph ☐ Paper glued ☐ Stenciled	d	Other		c c			
Section – IV								
Contact Point (Complete items directly below Name Georgia Anastasiou - Lewis & Harrison,		ndividual to be co gent for Handsta			bic application) lephone No. (Include Area Code) 202-593-5€03 ext. 19			
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete: Go acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.								
2. Signature Sleogra anastasion	Agent for Handstands			· · · · · · · · · · · · · · · · · · ·				
4. Typed Name Georgia Anastasiou - Lewis & Harrison	, LLC	March 3, 2014			WOTHER STATE			
EPA Form 8570-1 (Rev. 8-94) Previous editions a	re obsolete		White	- EPA File Copy (d				

LEWIS & HARRISON

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

telephone 202.393.3903 fax 202.393.3906

Consultants in Government Affairs

March 3, 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:

Handstands High Shine Protectant Wipes (EPA Reg. No. 89174-4)

Notification to Add Alternate Brand Names and

Make Minor Changes to Label

Dear Ms. Noble:

On behalf of Handstands, I am submitting a notification for the product Handstands High Shine Protectant Wipes (EPA Reg. No. 89174-4). The purpose of this notification is add the following alternate brand names:

"Antibacterial Protect Your Car Refresh Your Car Automotive Cleaning Wipes"
Antibacterial Leather Refresh Your Car Automotive Cleaning Wipes"

In addition I have made a few minor changes to the label. Many of the changes are non-FIFRA related and are minor revisions to the marketing language. I have included a copy of the revised label with the changes highlighted.

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.

Leogra anavasion

Georgia Anastasiou Agent for, Handstands Conte Resident de la Content d

Master Label

Handstands High Shine Protectant Wipes

ACTIVE INGREDIENTS: Alkyl (C ₁₄ 60%,C ₁₆ 30%,C ₁₈ 5%,C ₁₂ 5%) dimethyl benzyl ammonium chloride Alkyl (C ₁₂ 68%,C ₁₄ 32) dimethyl ethylbenzyl ammonium chloride OTHER INGREDIENTS: TOTAL: † does not include weight of dry wipe.						
KEEP OUT OF REAC CAUTION See [back] [side] pan	CH OF CHILDREN nel for additional preca	utionary statements.				
[NET CONTENTS:]	15 count 25 count 35 count 50 count (x) inches	(ct) 15 ct 25 ct 35 ct 50 ct (" x") 7" x 8"	(sheets) 15 sheets 25 sheets 35 sheets 50 sheets (cm xcm) 17.7cm x 20.3cm			
Includes weight of ab Brand Logo EPA Reg. No.: EPA Est. No.:	esorbent [wipe]	(oz.) (LBC		9		
Beginning of batch co U.S. Patent(s) (pendi and other patents per Package shape and o [See (bottom) or (cap	ode indicates EPA Est. ing) –or- (insert numbe nding configuration Tradema o) (for Lot / Date Code) of telephone) (Call:) (rked.	Des Prodes 1	ະ ເຄີຍ ເ ດດ ເຄ		
[For ingredient (and c www.RefreshYourCa © HandStands® All F	other) information, (plean r.com Rights Reserved th, Draper, Utah 84020 ar)	ase visit us at) (visit) (¢ ¢.	c c c c c c c c c		

[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* Wipes

Refresh [Automotive] [Your Car] Cleaning Wipes

Antibacterial*, Antibacterial* Action, Bacteria*

Clean, Cleans, Cleaning, Cleaner

Detail, Detailer, Details

Protect, Protects, Protectant, Protecting

Shine, Shines, Shining, Shinier

Leather, Soft, Supple

Condition, Conditions, Conditioner, Conditioning

Deodorize, 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

Medium Shine, High Shine, Hi-Gloss Shine

Cleans and Protects, Cleans and Renews, Cleans and Shines, [Your Car]

Removes Dust, Cleans and Conditions

Conditions and Enhances Leather's Rich, Natural Beauty, and Restores its Supple Feel

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, Sanitary and Smelling Like New

Rid your Car of (Odor Causing) Bacteria*

And Protect (You) (Your Family) from Bacteria*

(Helps) Eliminate Odor-Causing Bacteria* (while leaving a (fresh) (tropical) scent

*Kills Staphylococcus Aureus (Staph) and Enterobacter Aerogenes)

Optional Marketing / Claims- continued

(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 to Remove

(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), Along with (Conditioners) and (Protectants) to help (Prolong) (Extend) the (Life) of Your Car's Interior

(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 Premature Aging,

Sunblocking agents protect surfaces from fading, cracking, and aging [while providing maximum shine.] 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) (Shines) (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)

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)





Optional Antibacterial Claims

(Kills) (Eliminates) 99.9% of Bacteria*(in 90 Seconds)

(Kills) (Eliminates) 99.9% of (Staphylococcus Aureus) (Staph) (in 90 Seconds)

(Kills) (Eliminates) 99.9% of (Enterobacter Aerogenes) (in 90 Seconds)

Effective to (Kill) (Sanitize) 99.9% of Bacteria* (in 90 Seconds)

(Effective) (Sanitizer) for Use in the Interior of your (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, Leather, Aluminum, Stainless Steel, Rubber

[Use on the Following (Places) (Surfaces)] Hard Non-Porous Surfaces, Vinyl, Plastic, Leather, 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:

Peel back the front label slowly. Remove (cloth) (wipe) (as needed) (and 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 90 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 thoroughly wet surface. Surface must remain wet for the entire contact time. Allow to remain wet for 90 seconds. Allow surface to air dry.

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

*Kills Staphylococcus Aureus (Staph) and Enterobacter Aerogenes

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].

Optional Advisory Statements

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

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)

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)

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 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 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 you call a poison control center or doctor or going for treatment. [For further information, call xxx-xxx-xxxx.]

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. Discarding trash or recycle.

[Warranty Statement

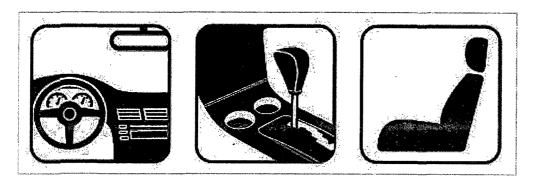
100% Satisfaction Guaranteed or Your Money Back. Refresh Your Car guarantees it's products will meet or exceed your highest standards. If you are unsatisfied for any reason, contact us for a full refund.]

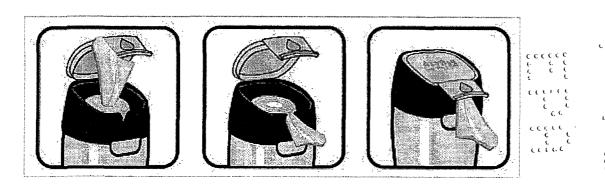
Optional Images:



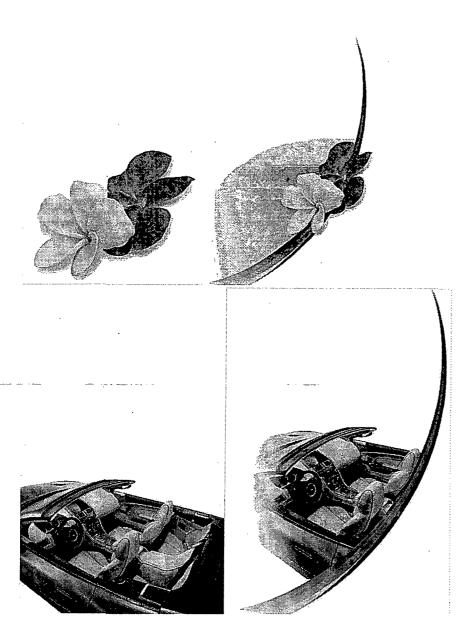


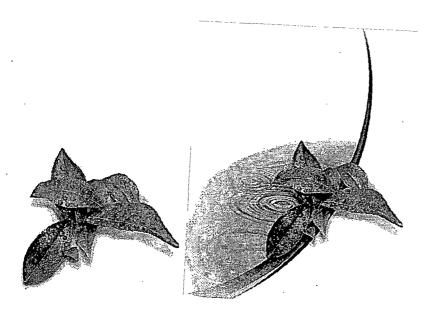


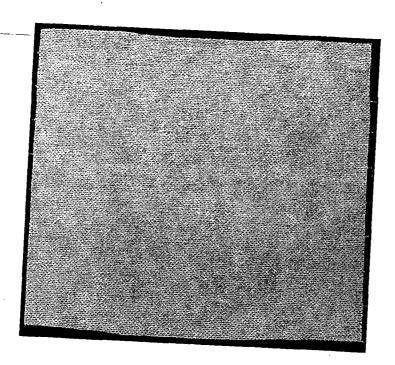




Handstands High Shine Protectant Wipes EPA Label 3-3-2014







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