

April 7, 2008

VIA FEDERAL EXPRESS

Judge Barbara A. Gunning
Administrative Law Judge
US EPA
Mail Code 1900L
1200 Pennsylvania Ave., NW
Washington, DC 20460-2001

Re: *Behnke Lubricants, Inc.*
Docket No. FIFRA-05-2007-0025

Dear Judge Gunning:

Enclosed please find a true and correct copy of Respondent's Exhibit RX65 (Bates Nos. Resp 00158 – Resp 00182).

The original and one copy of Respondent's Exhibit RX65 (Bates Nos. Resp 00158- Resp 00182) were delivered to the Regional Hearing Clerk, Region 5, U.S. EPA via overnight mail on April 7, 2008. True and accurate copies of same were delivered to Nidhi O'Meara and the court reporter via overnight mail on April 7, 2008.

Kindly acknowledge receipt of the enclosed by date stamping the extra copy of this letter and forwarding same to the undersigned in the envelope provided.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,



Bruce A. McIlnay

BAM/dlp

Enclosures

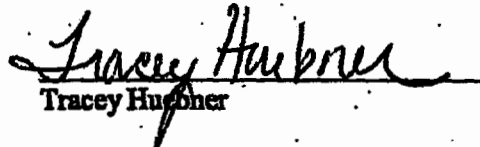
cc: Regional Hearing Clerk, w/encl. (via federal express)
Nidhi O'Meara, w/encl. (via federal express)
Court Reporter, w/encl. (via federal express)
Eric Peter, w/encl.

4. Attached hereto as Exhibit A is a schedule of all media placements for Behnke advertising during the calendar year 2005. Attached to the schedule are copies of the advertisements identified in the 2005 schedule.

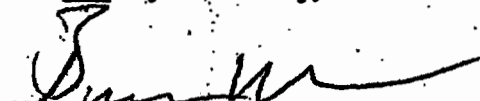
5. Attached hereto as Exhibit B is a schedule of all media placements for Behnke advertising during the calendar year 2006. Attached to the schedule are copies of the advertisements identified in the 2006 schedule.

6. Attached hereto as Exhibit C is a schedule for all media placements for Behnke advertising during the calendar year 2007. Attached to the schedule are copies of the advertisements identified in the 2007 schedule.

7. I make this affidavit of my own personal knowledge or based on records of either Core or Behnke, which records were maintained by both companies in the ordinary course of their business.


Tracey Hubner

Sworn to and subscribed before me
this 19 day of February, 2008


Notary Public, State of Wisconsin
My commission expires:

2006 Jan Ad Schedule

Publication	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Food Engineering		1/2 page ad		Extreme Toughness, plus full page ad, web site locator	Ad R	Knock-down, 1/2 supplier profile	Estimate locator, listing in the supplier directory	Ad R	Extreme Toughness	Expunge Labels, Ad R		
Meat & Poultry			Expunge Labels Product Showcase	Product Showcase	Product Showcase	Product Showcase	Product Showcase	Product Showcase	Knock-down Product Showcase	Product Showcase	Product Showcase	Experience
Rubber & Sock	Extremely Clean			Experience	Product Showcase	Event	Extremely Clean, Profile		Product Showcase	Event		
Specialty Wood Journal	Extremely Clean				Extremely Clean				Extremely Clean			



Xpunge Listeria...

E.coli. Salmonella. And other airborne microbes from your processing plant compressed air lubricants. Use JAX Magna-Plate 74 NSF H1 airline oil to lubricate your air motors, cylinders, meat saws, knives, stun guns and any other air-operated equipment.

True, Magna-Plate 74 provides exceptional antiwear protection and prevents rust and corrosion in your operation. But the real kicker is, it also knocks down microbe growth and exhausts tramp moisture from your air system. That's because JAX Magna-Plate 74 is the only FDA-compliant, NSF H1 lubricant to feature Micronox® - our proven, proprietary anti-microbial agent.

For details, contact your nearest JAX distributor today.



**Now available in new quart bottle
packaging for easier dispensing!**



America's Finest Industrial Lubricants

1.800.782.8850 | www.jax.com

Xtreme toughness

Bring JAX your most demanding lubrication challenges. High temperatures. Extreme pressure. Exposure to water or highly acidic foods. Whatever the conditions ... the new JAX Halo-Guard™ FG Grease was built to take it.

Formulated with a revolutionary thickener technology, JAX Halo-Guard™ provides the highest level of E.P. and anti-wear properties ever reported for a food-grade grease. Not to mention outstanding rust and corrosion-control capabilities.

Halo-Guard™ is water-resistant, compatible with most other greases and ideal for virtually any food/beverage application. So chances are, this tough, multi-purpose lubricant is one of the only greases you'll need to keep in stock.

Questions? Contact your nearest JAX distributor today.

America's Finest Industrial Lubricants



1.800.782.8850 | www.jax.com

Xtremely clean

JAX has developed the world's most advanced, high-temperature synthetic esters for lubrication of high-speed, automated, commercial baking ovens. JAX Pyro-Kote Series fluids provide smokeless, deposit-free lubrication of this sophisticated, production machinery at performance levels that meet and exceed OEM performance standards. Reduced carbon deposits, smoke-free performance and superb antiwear protection make JAX Pyro-Kote Series the new standard in Xtreme, clean, high-temperature baking lubrication.

For details, contact your nearest JAX distributor today.

America's Finest Industrial Lubricants



1.800.782.8850 | www.jax.com



Micronox™

The power to
KNOCKDOWN
deadly bacteria.

JAX gives you the industry's only one-two punch to help knock-out E-coli, Listeria or Salmonella growing in your plant. Our revolutionary **Micronox™** antimicrobial agent is a safe, powerful additive technology formulated into JAX line of high-performance synthetic or conventional food-grade lubricants. While other agents simply inhibit bacterial growth, this undisputed champ knocks down food and beverage microbial contaminants for the full count. For details, contact your JAX distributor.



America's Finest Industrial Lubricants

1.800.782.8850 | www.jax.com

Xterminate bacteria

Micronox[®] is a groundbreaking advance in food-grade technology that was developed by JAX with the intention of preserving and protecting food-grade lubricants from bacterial contamination in food-processing plants worldwide.

Independent laboratory tests show that sole use of lubricants containing Micronox[®] was shown to reduce the yeast and mold counts and prevent the formation of Listeria, E. coli and Salmonella.

Contact your JAX Distributor today and find out how Micronox[®] can make a difference in your food-processing facility.



1-800-782-8850
www.jax.com

TORO PETROLEUM
1234 Anywhere Street
Salinas, CA 98000
980-000-0000
www.toro.com

Xperience counts

JAX has been the leader in lubricating food processing machinery since the inception of food-grade lubricants over 40 years ago! Our experience with what works, and what does not, has led us to develop the highest performing, leading edge lubricants in the food and beverage processing industries. Talk to JAX about any machinery lubrication problem you may have. It's likely we have seen it and solved it already.

JAX Recent Landmark Developments in Food Plant Lubrication:

JAX Poly-Guard FG[®]

Greases with unsurpassed antiwear performance

JAX Pyro-Kote[®]

Ashless oven chain lubricants for ultimate oven chain cleanliness

JAX Halo-Guard™ FG

Greases with the highest E.P. ratings ever in a food-grade grease

JAX Micronox[®]

Antimicrobial additive, and the only one to provide significant microbial knockdown performance in food-grade lubricants

America's Finest Industrial Lubricants



Publication	Monday	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun
<p>Chief Editor: The Editor, <i>Sci Rep</i>, Springer, should send original and electronic versions of manuscripts, including cover pages and all references to the print version, to the editor. The digital version must be in PDF format.</p>														
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JAX has been the leader in lubricating food processing machinery since the inception of food-grade lubricants over 40 years ago! Our experience with what works, and what does not, has led us to develop the highest performing, leading edge lubricants in the food and beverage processing industries. Talk to JAX about any machinery lubrication problem you may have. It's likely we have seen it and solved it already.

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Greases with unsurpassed antiwear performance

JAX Pyro-Kote®

Ashless oven chain lubricants for ultimate oven chain cleanliness

JAX Halo-Guard™ FG

Greases with the highest E.P. ratings ever in a food-grade grease

JAX Micronox®

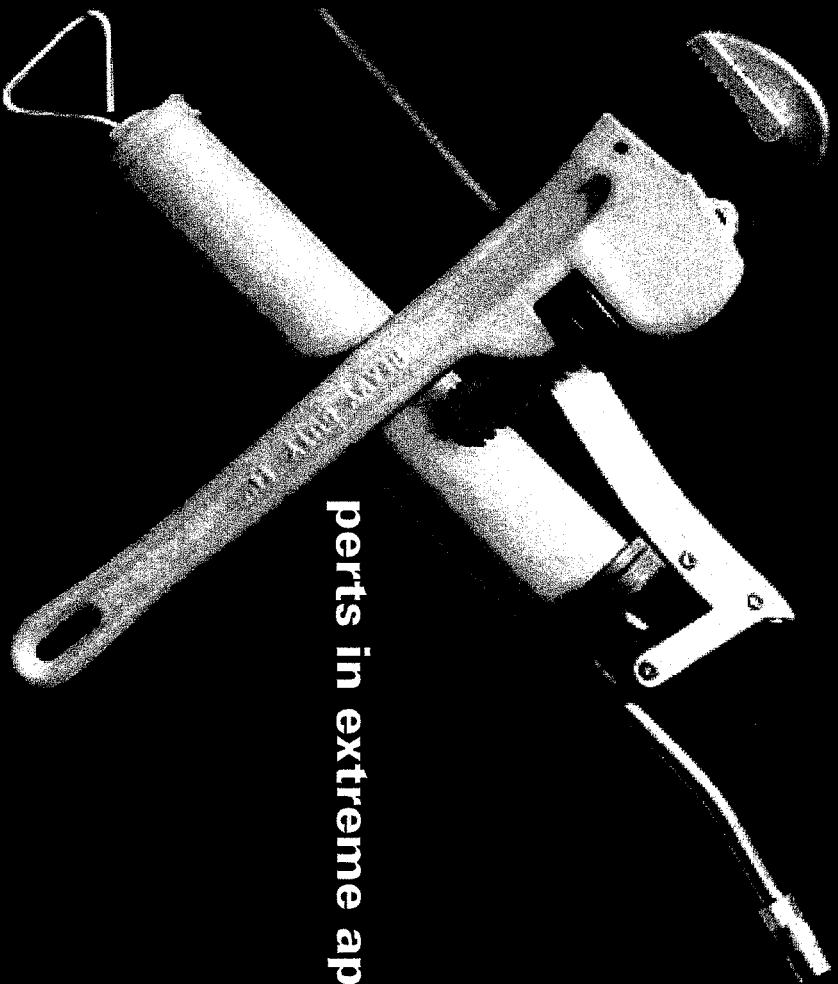
Antimicrobial additive, and the only one to provide significant microbial knockdown performance in food-grade lubricants



America's Finest Industrial Lubricants

1.800.782.8850 | www.jax.com

In '06
took off
Micronox
line



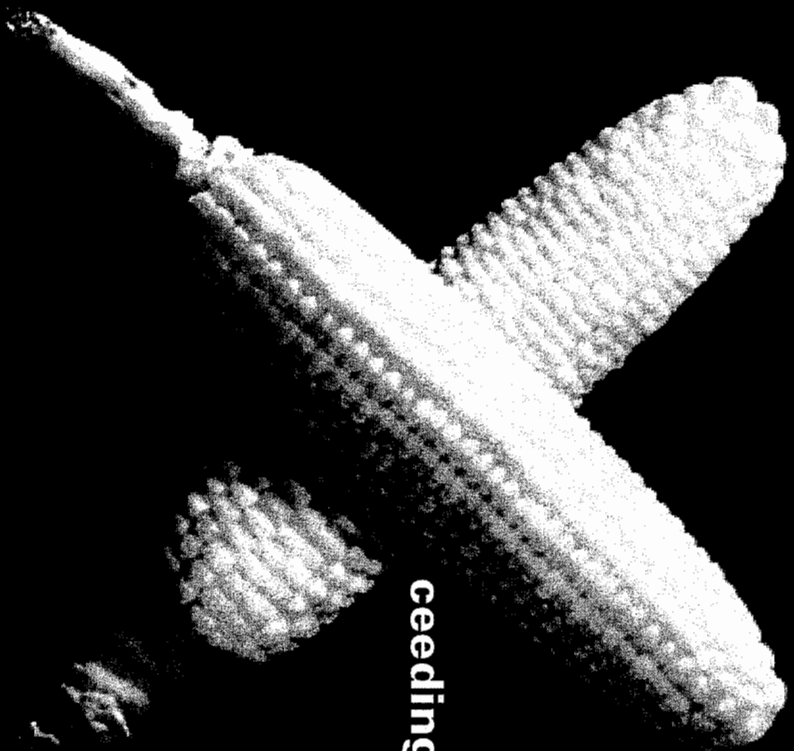
parts in extreme applications.

From high temperatures, contamination, water or even chemical assaults, your lubricated machine parts can take a beating day in and day out. When conditions are extreme, JAX expertise is the right tool for the job. With forward thinking, in-house solutions and constantly evolving R&D, we can help maintain and protect your valuable investments — no matter what industry you serve.



800.782.8850

www.jax.com



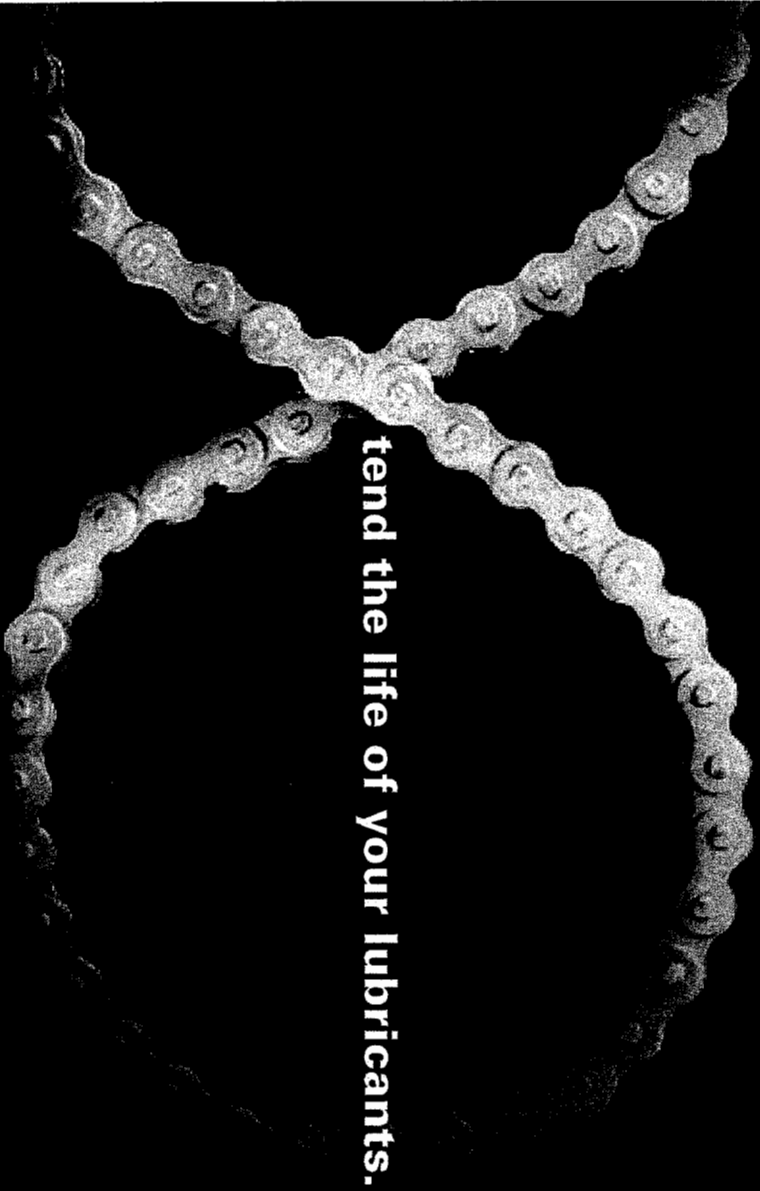
ceeding expectations in the food industry.

Since the inception of food machinery lubricants, JAX has been the pace-setter in meeting — and exceeding — lubrication needs. For more than 50 years companies have relied on our expertise in not only product enhancement, but in our ability to help maintain and prolong the life of their machines through maintenance solutions tailored to each specific challenge. After all, there's no such thing as a cookie cutter answer — even in the food industry.



800.782.8850

www.jax.com



Extend the life of your lubricants.

With oil prices soaring and the ever-present need to extend machinery protection, it's vital today to get the most out of your lubricants. From advanced base oils and the most recent 100% synthetic technology to innovative lab analysis services, JAX formulations help you slash replacement purchases by making your lubricants last beyond conventional limits. It's time to make every ounce count, and to count for as long as possible.



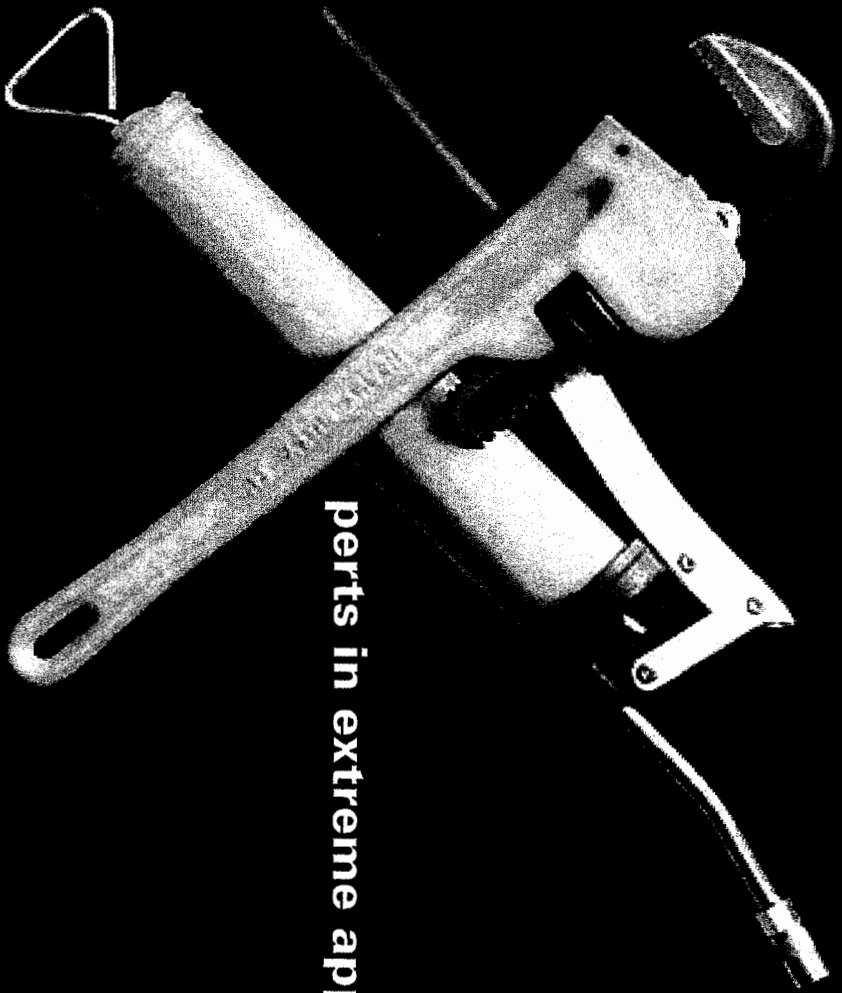
800.782.8850

www.jax.com

2007 Jan Ad Schedule

Publication	Contact	Frequency	Merchandising	Jan	Feb	March	April
Food Engineering	Paul Kelly 650-494-4598 pkelly@businessmedia.com	bx 1/2 page insertions plus a full page ad	2 free ads - one in January you run another ad in January, the other in November	CHANGEGREASE GUN AD (2) 1/2 Page 4/C Closed 2/9/07		GREASE GUN AD 1/2 Page - 4/C Closed 2/9/07	GREASE GUN AD 1/2 Page - 4/C Closed 2/16 Full page - Catalog Closes 4/13
Meat & Poultry	Mark Feder 1-800-558-8201 mfeder@meatand.com	4x	product releases, press releases, web site promotions, direct mail support, technology related editorial coverage, supplier profiles and advertising readership studies				CHAIN AD 1/2 Page - 4/C Closes 4/29/07
Baking & Snack	Mark Feder 1-800-558-8201 mfeder@meatand.com	4x	Product releases, press releases, direct mail support, website promotions, advertising readership studies, supplier profiles and all advertisers in the print version are included in the digital edition free of charge.				CHAIN AD 1/2 Page - 4/C Closes 4/29/07
Machinery Lubrication	Bank O'Kelly 800-587-4400x112 BOKelshy@pof.com	4x					TBD 1/2 Page 4/C
Engineered Wood Journal	Eric Hanson www.iewj.com	1x					
Specialty Wood Journal	Beth Satic bsatic@wpub.com 647-602-6810	3x					





parts in extreme applications.

From high temperatures, contamination, water or even chemical assaults, your lubricated machine parts can take a beating day in and day out. When conditions are extreme, JAX expertise is the right tool for the job. With forward thinking, in-house solutions and constantly evolving R&D, we can help maintain and protect your valuable investments — no matter what industry you serve.



800.782.8850
www.wjax.com



tend the life of your lubricants.

With oil prices soaring and the ever-present need to extend machinery protection, it's vital today to get the most out of your lubricants. From advanced base oils and the most recent 100% synthetic technology to innovative lab analysis services, JAX formulations help you slash replacement purchases by making your lubricants last beyond conventional limits. It's time to make every ounce count, and to count for as long as possible.



300.782.8850
www.jax.com

Xtremely clean

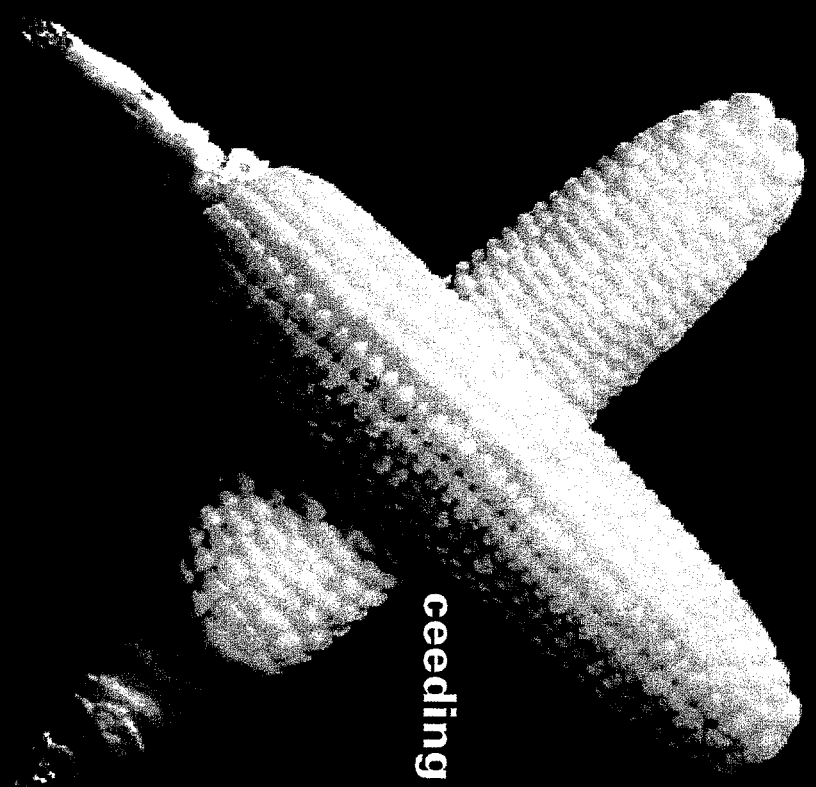
JAX has developed the world's most advanced, high-temperature synthetic esters for lubrication of high-speed, automated, commercial baking ovens. JAX Pyro-Kote Series fluids provide smokeless, deposit-free lubrication of this sophisticated, production machinery at performance levels that meet and exceed OEM performance standards. Reduced carbon deposits, smoke-free performance and superb antiwear protection make JAX Pyro-Kote Series the new standard in Xtreme, clean, high-temperature baking lubrication.

For details, contact your nearest JAX distributor today.

America's Finest Industrial Lubricants



1.800.782.8850 | www.jax.com



ceeding expectations in the food industry.

Since the inception of food machinery lubricants, JAX has been the pace-setter in meeting — and exceeding — lubrication needs. For more than 50 years companies have relied on our expertise in not only product enhancement, but in our ability to help maintain and prolong the life of their machines through maintenance solutions tailored to each specific challenge. After all, there's no such thing as a cookie cutter answer — even in the food industry.



800.782.8850
www.jax.com



Solutions for you and you alone. No

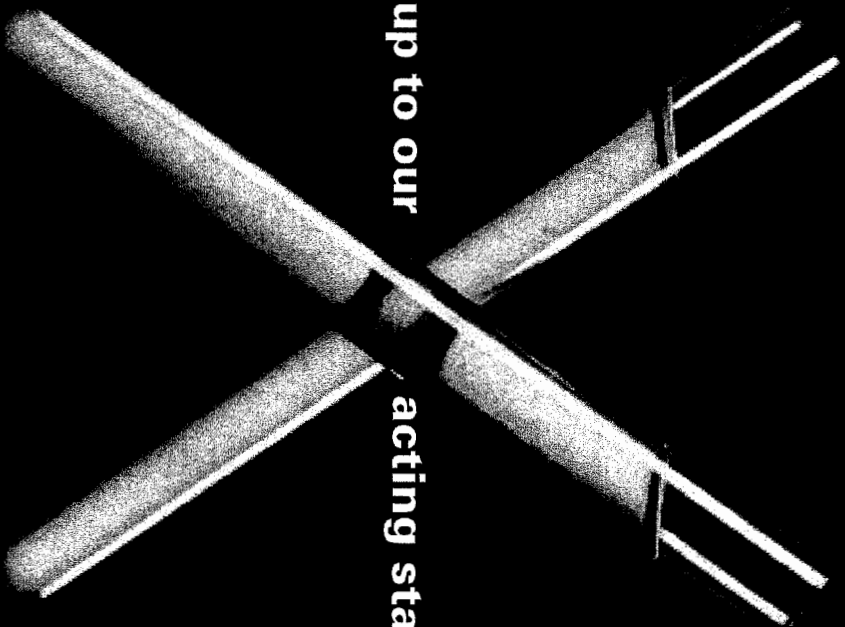
ceptions.

If there is one thing our 50 years of industry experience have taught us, it's that products which may have worked in the past may not be sufficient to provide adequate lubrication in the future. At JAX, we are relentless in our quest to provide you with the most innovative and individualized lubricant solutions to extend the life of your machinery, reduce downtime and increase production. Just as your needs are ever-changing, so is our line of industrial lubricants — because after all, there is no such thing as a cookie-cutter solution.



800.782.8850

www.jax.com



No other lubricant measures up to our acting standards.

For over 50 years, companies have relied on our expertise in lubricant technology and our commitment to research and development of innovative lubrication solutions. It's for these reasons that all JAX lubricants are compounded with the finest raw materials and formulated by the industry's foremost engineers to not only exceed our own high standards, but also surpass your expectations for performance and value. When it comes to your business, you demand excellence — it's our responsibility to deliver nothing less.



800.732.8850

www.jax.com



Extend the life of your lubricants.

With oil prices soaring and the ever-present need to extend machinery protection, it's vital today to get the most out of your lubricants. From advanced base oils and the most recent 100% synthetic technology to innovative lab analysis services, JAX formulations help you slash replacement purchases by making your lubricants last beyond conventional limits. It's time to make every ounce count, and to count for as long as possible.



800.782.8850
www.jax.com



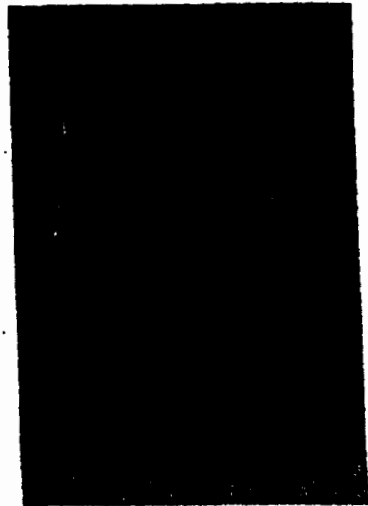
Resp 00181



Metal detector

The Cintex Sentry VF variable frequency metal detector from Loma automatically analyzes product affect (temperature, moisture, salt content, speed and packaging material), reviews a band of frequencies and selects the right one for the specific application. Because the frequencies are not present when the unit is manufactured, packagers can run a variety of products through the same unit.

Loma Systems, Inc.; 630-681-2050 ◀



Resealable pouch

Zip-Pak's resealable quad-seal pouch is made from four registered webs and allows graphics and materials to be changed on any of the four webs. The gusseted pouches incorporate Zip-Pak zippers to allow resealable packaging for frozen foods, salty snacks and fresh cut produce. The package is produced on a gearless RiteBag Plus machine, which allows converters to make two-side seal, three-side seal, bottom-folded, stand-up and quad-seal gusseted pouches on a single machine.

Zip-Pak; 815-468-6500;
www.zippak.com ▲

Inspection tool

DVT's Legend LS Line Scan vision system incorporates a Texas Instruments DSP processor and has a 2K linear sensor yielding images up to 18,000 lines per second. The unit is suitable for unwrapping cylindrical objects for label inspection and scanning an object to obtain a high-resolution image.

DVT Machine Vision; 770-814-7920; www.dvtsensors.com