

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)
)
BEHNKE LUBRICANTS, INC.)
MENOMONEE FALLS, WISCONSIN) Docket No. FIFRA-05-2007-0025
)
Respondent.)
)

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COMPLAINANT'S FIFTH SUPPLEMENTAL PREHEARING EXCHANGE

Complainant, the United States Environmental Protection Agency, Region 5 (U.S. EPA or Complainant), hereby files the instant *Complainant's Fifth Supplemental Prehearing Exchange* pursuant to Sections 22.16(a) and 22.19(f) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits ("Consolidated Rules" or "CROP"), codified at 40 C.F.R. §§ 22.16(a) and 22.19(f).

Additional Exhibits

- CX 73 Website printout from JAX.com re: JAX international distributors and current anti-microbial claims for Respondent's products
- CX 74 Website printouts from Mosur Machine website describing business relationship with Respondent.
- CX 75 Website printouts from Global Industrial Services Website describing business relationship with Respondent
- CX 76 January 11, 2006 approved label amendments for Lysol Brand All Purpose Cleaner

Additional Witness Testimony

1. Dennis Edwards
Office of Pesticides Programs
United States Environmental Protection Agency

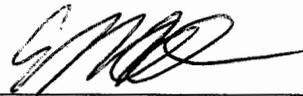
In addition to the testimony described in Complainant's October 4, 2007 Initial Prehearing Exchange, Mr. Edwards may testify about the nature, properties, and any other relevant information regarding the chemical constituents of Behnke's products as provided by Respondent in its Supplemental Prehearing Exchange.

2. Dr. Tajah L. Blackburn, PhD
Lieutenant, Public Health Service Commissioned Corps
Product Science Branch
Antimicrobials Division
Office of Pesticides Programs
U.S. Environmental Protection Services
United States Environmental Protection Agency

In addition to the testimony described in Complainant's October 20, 2007 Supplemental Prehearing Exchange, Dr. Blackburn may testify about the nature, properties, and any other relevant information regarding the chemical constituents of Behnke's products as provided by Respondent in its Supplemental Prehearing Exchange.

Complainant's Fifth Supplemental Prehearing Exchange is being filed contemporaneously with a corresponding motion to supplement the prehearing exchange.

Respectfully Submitted,



Nidhi K. O'Meara
James J. Cha
Erik H. Olson
Associate Regional Counsels
U.S. EPA, Region 5

3/19/08
Date

In the Matter of Behnke Lubricants, Inc.
Docket No. FIFRA-05-2007-0025

CERTIFICATE OF SERVICE

I hereby certify that the original and one true, accurate and complete copy of Complainant's Fifth Supplemental Prehearing Exchange were filed with the Regional Hearing Clerk, U.S. EPA, Region 5, on the date indicated below, and that true, accurate and complete copies of Complainant's Fifth Supplemental Prehearing Exchange were served on the Honorable Barbara Gunning, Administrative Law Judge (service by Pouch Mail), and Mr. Bruce McIlroy, Esq., Counsel for Respondent Behnke Lubricants, Inc. (service by Federal Express), on the date indicated below:

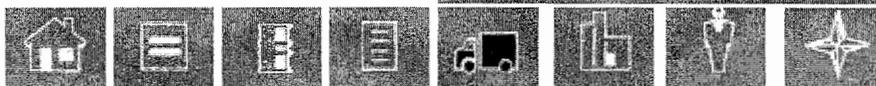
Dated in Chicago, Illinois, this 19 day of March, 2008.


Patricia Jeffries-Harwell
Legal Technician

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CX 73

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DISTRIBUTORS**Current International Distributors**

JAX local stocking distributors are located throughout the USA, Canada and Internationally.

Please contact JAX Corporate Headquarters at 800-782-8850 or 262-781-8850, or use

the following e-mail link to provide us with your name, location and industry information.

We will quickly direct you to your most convenient, local JAX Distributors.

E-mail: info@jax.com

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North America:**Eastern Canada:**

Website: www.mosur.com

Western Canada:

E-mail: nickrai@telus.net

Mexico:

Website: www.gissa.com

South and Central America:**Costa Rica:**

Website: www.lubripolo.com

Argentina:

Website: www.altpros.com.ar

Europe:**EUROPEAN MASTER DISTRIBUTOR:**

Industrial Lubricants APS

Essen 10

DK-6000 Kolding Denmark

Telephone: +45 75 50 35 00

Fax: +45 75 50 20 21

Website: www.indlub.dk

E-Mail: indlub@indlub.dk

England & Wales:

Industrial Lubricants (UK) Ltd Tel.

+44 (0)8701 632 933

Website: www.indlub.co.uk

Email: sales@indlub.co.uk

Germany:

Website: www.finke-mineraloelwerk.de

France:

Website: www.jax.fr

Italy:

Website: www.savinimilano.com

Portugal:

Website: www.engitec.pt

Hungary:**Latvia:**

E-mail: Gunarsv@broste.com

Norway:

E-mail: berget@jax.no

Sweden:

E-mail: info@lubitas.se

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Baking & Oven Processes

Modern, high production bakeries are extremely severe in terms of wear, corrosion and high temperature conditions. **JAX Proofer Chain Oil** provides outstanding wear protection and corrosion inhibition on all proofer chains which are under some of the worst humidity and rust prone conditions found in any industry.

The other extreme, oven conveyor chain lubrication, is handled with the highest performing oven chain lubricants in the industry. **JAX Pyro-Kote Series** of 100% Synthetic oven chain oils clean and maintain chain cleanliness beyond any conventional or synthetic lubricant. The high smoke and flash points enhance plant safety, and the proprietary anti-wear chemistry extends chain life far beyond any normal expectations.

- **JAX Proofer Chain Oil** can enhance plant energy conservation and proofer chain life through the use of costly corrosion inhibitors and anti-wear chemistry.
- **JAX Pyro-Kote Series** 100% synthetic oven chain oils are industry renowned for cleaning carbon deposits, their high flash points and extending chain life.
- Plant safety concerns are often addressed through **JAX Pyro-Guard** synthetic, fire-resistant, anti-wear hydraulic fluids.
- Long-term, high temperature bearing life can be further extended by using our remarkable high temperature food grade greases **JAX Poly-Guard FG** and **JAX Halo-Guard FG** greases for hand greased and centralized lubrication.
- **JAX SynGear Industrial Gear Oils** 100% synthetic high temperature gear oils provide long drain, anti-wear performance under sever temperature conditions.

The capstone of our programs and solutions for high production bakery lubrication is the JAX Total Plant Lube Program anchored to our comprehensive ongoing lubricant analysis program performed by **JAX RPM Laboratory Division**. This final step completes a total predictive maintenance program combining America's Finest Lubricants with a proactive maintenance program that assures the maximum in plant production, equipment life, efficiency and uptime.

[Chain & Conveyor Lubes](#)
[Compressor Oils](#)
[Gear Box Oils](#)
[Hydraulic Oils](#)
[Greases](#)

Chain & Conveyor Lubes

Pyro-Kote Series (ISO 32, 68, 220)

100% Synthetic JAX Pyro-Kote Series provides unsurpassed performance in the field of synthetic conveyor lubes. It is the finest, high-temperature synthetic oven chain lubricant for applications up to and exceeding 650°F. Provides extreme chain cleanliness, low volatility and excellent anti-wear protection. Dispersency characteristics can clean residues from inferior high-temperature lubes. ISO Grades 32, 68, 220

Proofer Chain Oil NSF H1

This lubricant is specially compounded for lubrication in high-humidity environments. Formulated to provide extremely high performance on bakery proofer chains and other food processing equipment.

Magna-Kote 400 Series

Bonded 'dry-film' conveyor lubricants for high-temp applications. Magna-Kote 404 is graphite-based, Magna-Kote 412 is Moly Sulfide-based, and Magna-Kote 420 contains graphite, Moly and other performance additives. The carrier flashes or evaporates off at low temperatures leaving bonded 'dry-film' lubrication.

[BACK TO TOP](#)

Compressor Oils

Syncomp-D Series

These are the finest, high-performance, synthetic Diester fluids used to lubricate all types of compressors. They offer extended drain intervals many times greater than the best mineral-based fluids. They extend compressor life and reduce routine maintenance of the compressor. They leave minimum deposits on valves of reciprocating compressors and have excellent anti-wear properties. JAX Syncomp-D fluids are especially effective in sliding vane and rotating screw compressors operating under severe conditions.

[BACK TO TOP](#)

Gear Box Oils

SynGear-Industrial Gear Oils ISO 46, 68, 100, 150, 220, 320, 460, 680

100% Synthetic

These high-performance industrial fluids are compounded for severe-duty conditions where extreme temperatures cause problems with conventional mineral oil-based industrial gear lubes. They offer excellent gear protection and extended service life for multiple applications. Select additives provide rust protection, anti-foam, anti-wear, and demulsibility.

Magna-Plate 220-FG, 320-FG, 460-FG

NSF H1

These gear oils are partial synthetic based with sheer stable synthetic V.I. improvers. As a result, you will be able to use these in gear box applications previously thought too severe for food-grade lubricants. The superior operating characteristics provide reduced operating temperatures, reduced friction, and minimal gear wear. Its high-film strength offers excellent lubricity for spur, helical, spiral, bevel, planetary, and worm gears.

[BACK TO TOP](#)

Hydraulic Oils

Pyro-Guard Fluids

100% Synthetic

These 100% synthetic, fire resistant, hydraulic fluids have a unique, ashless anti-wear additive that offers pump and valve protection in a wide variety of applications. These hydraulic oils have very good water separation and they withstand much higher temperatures than fluids with conventional anti-wear additive systems. Pyro-Guard Hydraulic Fluids are compounded 100% synthetic esters for areas requiring fire resistant, high flash point, anti-wear hydraulic fluids.

[BACK TO TOP](#)

Greases

Poly-Guard FG-2, FG-LT

Unsurpassed Anti-Wear

NSF H1

This is a food-grade lubricant that provides performance levels higher than anything the industry has ever seen before. It has a new advanced technology thickener, greatly enhanced rust protection, and the highest level of E.P. and anti-wear performance available. Other features include excellent pumpability, separation control, and easier clean-up for sanitation. Now contains Micronox® anti-microbial for true 'knock-down' performance against a broad spectrum of microbial contaminants.

Halo-Guard FG-2

Extreme High Temp - Corrosion Control

NSF H1

The latest, high performance, high temperature, food machinery grease offered by JAX. Extreme Pressure (E.P.) performance at industrial grease levels, and its remarkable corrosion inhibition properties make Halo-Guard FG the newest star for

all grease lubricated applications in modern bakeries and food processing plants.

[BACK TO TOP](#)

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Meat, Poultry & Seafood Processing

JAX has been the industry leader in lubrication of beef, pork, poultry and coastal seafood facilities in the USA for over 40 years. The introduction of JAX exclusive **Micronox® Technology** gives plants in search of tools for added control a powerful, extra weapon in their arsenal of protection!

JAX manufactures NSF H1 rated food grade lubricants that provide technology and equipment wear protection beyond any H1 lubricants in the industry. We remain the Pioneers in high performance food grade lubrication with innovations such as Micronox, and our state-of-the-art greases **JAX Poly-Guard® FG** and **JAX Halo-Guard® FGI**

JAX range of products includes high performance conventional and synthetic food grade greases, vacuum pump oils, food grade anti-wear hydraulic oils, trolley lubes, specialized greases for high speed air equipment, inhibited air line lubricants, CryoGuard ammonia refrigeration oils, synthetic air compressor oils and numerous other specialized lubricants for specific meat, poultry and seafood plant applications.

- Vacuum Pump uptime and oil life can be greatly extended with industry renowned **JAX R-P Vacuum Pump Oil H-T**
- **JAX Poly-Guard FG** and **Halo-Guard FG** greases provide outstanding wear protection, corrosion control and lubricity, and also contain Micronox®.
- **JAX CryoGuard Plus** ammonia refrigeration oil not only outperforms outdated naphthenic technology, but in RBOT testing shows triple the oxidation life of its most popular competitor

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[Confection Processing](#)

[By Industry Menu](#)

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Fruit & Vegetable Processing

JAX first began developing products for vegetable canners in the upper Midwest over 40 years ago. With the help and cooperation of our customer partners, JAX has developed the world's most sophisticated line of lubes for this industry. We provide the widest selection of machinery specific lubrication solutions for all fruit and vegetable processing plants. The ranges of products provided include synthetic and high-performance NSF H1 food grade greases and lubricating oils for applications as diverse as apple peelers to apricot pitters, or bean snippers to beet cutters, or can closers to continuous cookers, or... you get the idea... JAX has it covered from Almonds to Zucchini!

JAX Lubricants for fruit and vegetable processing are anything but conventional. They are formulated to handle both high speed-high temp machinery conditions, and the inevitable water and product contamination which can be so hard on parts. With the added benefit of **Micronox®**, JAX exclusive anti-microbial chemistry which independent testing has proven to be the most effective in the industry, plants can achieve an extra measure of sanitation protection

- **JAX Poly-Guard FG and JAX Halo-Guard FG** greases provide levels of anti-wear protection superior to conventional food grade greases. These are the first, true 'Plant-Wide' food grade greases.
- **JAX Poly-Guard FG** grease contains Micronox® the only truly effective, active bacteria control agent in the food grade lubricant industry
- JAX extensive line of synthetic air compressor oils dramatically extends compressor life and drain intervals. The high temperature, long life characteristics of **JAX Syncomp-D, Syncomp-P and Syncomp-FG** fluids meet or exceed all OEM requirements.
- **JAX Magna-Plate 78 and Angel-Guard Synthetic** Seamer Oils are the food grade standards for exceptional anti-wear performance in Angelus Seamer applications.
- **JAX Magna-Plate 2000, 2000-FG and 2100** (Zinc Free) Cooker Oils for trouble free operation on FMC continuous cookers and steam peelers.

Specialty Lubes
Compressor Oils
Gear Box Oils
Hydraulic Oils
Greases

Specialty Lubes

Magna-Plate 2000

Continuous Cookers

High-viscosity cooker oil with polymer tac additive, emulsifying agent, and a high percentage of anti-wear additives. Specially compounded for FMC continuous cookers and steam peelers with Manzel lubricators. Excellent in Micro Valve applications.

Magna-Plate 2100

Continuous Cookers - Non-Zinc, High Performance

The next generation of cooker oils. Magna-Plate 2100 is a high temperature, non-zinc FMC approved rotary cooker oil. Benefits include greatly reduced wear and corrosion deposits on bronze packing strips.

Magna-Plate 2000-FG

USDA/NSF H1

Cookers & Peelers

USDA H1 food-grade Lubricating Oil. For use in the FMC continuous cooker and FMC & Odenberg steam peelers. Eliminates rubbery deposits, clogged lines and gummed check valves. A special polymer helps 2000FG cling to metal surfaces even after shutdown, reducing metal-to-metal contact on start-up.

Unitran-FG Fluid

USDA/NSF H1***Hydrostatic Transmission Fluid***

This is a new generation, food grade, premium hydraulic transmission fluid that meets service requirements for farm and industrial tractor power train fluid. It is compatible with all of the known brands of universal tractor fluid. JAX now provides a high performance, food grade fluid for use in harvesting equipment operating in product sensitive areas where contamination from industrial fluids cannot be tolerated. JAX Unitran-FG provides excellent performance regarding wear, chatter, brake capacity, PTO performance and filterability.

[BACK TO TOP](#)

Compressor Oils**Syncomp-FG Series Fluids - ISO Grades 32, 46, 68, 100, 150
USDA/NSF H1****100% Synthetic**

These unique fluids are designed to lubricate flooded screw compressors, vacuum pumps, refrigerant compressors, and other mineral oil lubricated air compressors. They exhibit excellent low- and high-temperature characteristics, reduced volatility, and good compatibility with mineral oils.

CryoGuard Plus Fluids - ISO Grades 32, 68

These are state-of-the-art premium paraffinic refrigeration compressor fluids with excellent low-temperature properties. They are specifically compounded for use in ammonia refrigerant compressors. JAX CryoGuard Plus fluids also exhibits exceptional stability at high temperatures, provide extended equipment life and are compatible with the seals found in refrigeration systems.

[BACK TO TOP](#)

Gear Box Oils

Magna-Plate 220FG, 320FG, 460FG, Cylinder Oil FG

*USDA/NSF H1
PARTIAL SYNTHETIC*

These gear oils are white oil-partial synthetic based with sheer stable synthetic V.I. improvers. As a result, you will be able to use these in gear box applications previously thought to be too severe for food-grade lubricants. The superior operating characteristics provide reduced operating temperatures, reduced friction, and minimal gear wear. Their extremely, high-film strength offers excellent lubricity for spur, helical, spiral, bevel, planetary, and worm gears.

Magna-Plate 85W140-FG, 250-FG

*USDA/NSF H1
100% SYNTHETIC - PAG*

These are unique, food-grade synthetic gear oils that have many advantages over food-grade, mineral-based gear oils. The base fluid is very stable to heat, and the pour points makes them useful at low operating temperatures. They can be used in a wide variety of severe applications where mineral base oils are not practical or effective. Drain intervals can be increased several times, and they also provide measurable energy saving benefits.

[BACK TO TOP](#)

Hydraulic Oils

Magna-Plate 60, 62, 64, 66

USDA/NSF H1

America's Finest Food-Grade Hydraulic Fluids can be used in a variety of applications where a USDA/NSF H1 fluid is required. They are white mineral base oils containing rust and oxidation additives, and excellent anti-wear protection. They are fully tested and OEM approved for industrial hydraulic systems, and recommended for compressors and gear systems requiring food-grade oils.

**FGH-AW Fluids - ISO Grades 32, 46, 68, 100TC
USDA/NSF H1**

Food-grade hydraulic fluids containing a combination of anti-wear and rust and oxidation inhibitor agents. For use in food plant hydraulic applications where food-grade, NSF H1 anti-wear hydraulic oils are required.

[BACK TO TOP](#)

Greases**Poly-Guard FG-2, FG-LT
Unsurpassed Anti-Wear
USDA/NSF H1**

This is a food-grade lubricant that provides performance levels higher than anything the industry has ever seen before. It has a new advanced technology thickener, greatly enhanced rust protection, and the highest level of anti-wear performance available.

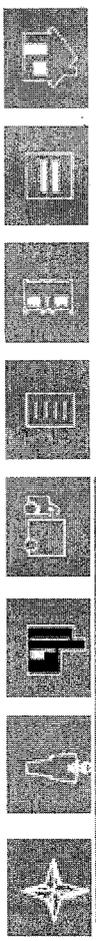
Other features include excellent pumpability, separation control, and easier clean-up for sanitation. Now contains Micronox® anti-microbial for true 'knock-down' performance against a broad spectrum of microbial contaminants.

**Halo-Guard FG-2
Extreme High Temp - Corrosion Control
USDA/NSF H1**

The latest, high performance, high temperature, food machinery grease offered by JAX. Extreme Pressure (E.P.) performance at industrial grease levels, and its remarkable corrosion inhibition properties make Halo-Guard FG the newest star for all grease lubricated applications subject to high acid products in modern fruit and vegetable processing plants.

[BACK TO TOP](#)

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Beverage Processing

Today's brewery and soft drink beverage plants contain some of the most modern and sophisticated process and packaging machinery in the world. JAX is an industry leader supplying world class lubrication technology for this extremely fast paced industry.

The introduction of JAX exclusive **Micronox® Technology** gives plants in search of tools for added control a powerful, extra weapon in their arsenal of protection! JAX manufactures NSF H1 rated food grade lubricants that provide technology and equipment wear protection beyond any H1 lubricants in the industry. JAX continues to be 'The Pioneers' in high performance food grade lubrication with innovations such as Micronox®, and new state-of-the-art greases JAX Poly-Guard FG and Halo-guard FGI

JAX addresses all major lubrication points on both brewing and packaging sides of the plant. Our machinery specific lubricants, industry experience and technical knowledge extend to all brewing and beverage plant equipment including:

- **JAX Magna-Plate 78 and JAX Angel-Guard Synthetic** can seamer oils are compounded with the industry's best anti-wear technology in both conventional and 100% synthetic formulations.
- **JAX Poly-Guard FG** greases contain Micronox®, and provide remarkable levels of anti-wear protection on seaming roll bearings and other grease lubricated applications anywhere in the plant.
- **JAX CryoGuard Plus** ammonia refrigeration oil not only outperforms outdated naphthenic technology, but in RBOT testing shows triple the oxidation life of its most popular competitor
- **JAX Magna-Plate FG Gear Oils** are partial and 100% synthetic food grade gear oils providing outstanding protection to all enclosed gear case applications.
- **JAX Gear-Guard FG** synthetic open gear grease resists wash off and sling on filler drive gears better than any open gear greases on the market.

The capstone of our programs and solutions for modern beverage plant lubrication is the JAX Total Plant Lube Program anchored to our comprehensive ongoing lubricant analysis program performed by **JAX RPM Laboratory Division**.

From compressor and seamer used oil analysis to greased bearing wear analysis, this final step completes a Total Predictive Maintenance program combining America's Finest Lubricants with proactive maintenance procedures that assure the maximum in plant production, equipment life, efficiency and uptime.

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[Dairy & Cheese MFG](#)

[Baking & Oven Processes](#)

[Confection Processing](#)

[By Industry Menu](#)

[<< JAX homepage](#)

Fruit & Vegetable Processing

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JAX Lubricants for fruit and vegetable processing are anything but conventional. They are formulated to handle both high speed-high temp machinery conditions, and the inevitable water and product contamination which can be so hard on parts. With the added benefit of **Micronox®**, JAX exclusive anti-microbial chemistry which independent testing has proven to be the most effective in the industry, plants can achieve an extra measure of sanitation protection

- **JAX Poly-Guard FG and JAX Halo-Guard FG** greases provide levels of anti-wear protection superior to conventional food grade greases. These are the first, true 'Plant-Wide' food grade greases.
- **JAX Poly-Guard FG** grease contains **Micronox®** the only truly effective, active bacteria control agent in the food grade lubricant industry
- JAX extensive line of synthetic air compressor oils dramatically extends compressor life and drain intervals. The high temperature, long life characteristics of **JAX Syncomp-D, Syncomp-P and Syncomp-FG** fluids meet or exceed all OEM requirements.
- **JAX Magna-Plate 78** and **Angel-Guard Synthetic Seamer Oils** are the food grade standards for exceptional anti-wear performance in Angelus Seamer applications.
- **JAX Magna-Plate 2000, 2000-FG and 2100** (Zinc Free) Cooker Oils for trouble free operation on FMC continuous cookers and steam peelers.

Specialty Lubes
Compressor Oils
Gear Box Oils
Hydraulic Oils
Greases

Specialty Lubes

Magna-Plate 2000

Continuous Cookers

High-viscosity cooker oil with polymer tac additive, emulsifying agent, and a high percentage of anti-wear additives. Specially compounded for FMC continuous cookers and steam peelers with Manzel lubricators. Excellent in Micro Valve applications.

Magna-Plate 2100

Continuous Cookers - Non-Zinc, High Performance

The next generation of cooker oils. Magna-Plate 2100 is a high temperature, non-zinc FMC approved rotary cooker oil. Benefits include greatly reduced wear and corrosion deposits on bronze packing strips.

Magna-Plate 2000-FG

USDA/MSF H1

Cookers & Peelers

USDA H1 food-grade Lubricating Oil. For use in the FMC continuous cooker and FMC & Odenberg steam peelers. Eliminates rubbery deposits, clogged lines and gummed check valves. A special polymer helps 2000FG cling to metal surfaces even after shutdown, reducing metal-to-metal contact on start-up.

Unitran-FG Fluid

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Hydrostatic Transmission Fluid

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[BACK TO TOP](#)

Compressor Oils

Syncomp-FG Series Fluids - ISO Grades 32, 46, 68, 100, 150

USDA/MSF H1
100% Synthetic

These unique fluids are designed to lubricate flooded screw compressors, vacuum pumps, refrigerant compressors, and other mineral oil lubricated air compressors. They exhibit excellent low- and high-temperature characteristics, reduced volatility, and good compatibility with mineral oils.

CryoGuard Plus Fluids - ISO Grades 32, 68

These are state-of-the-art premium paraffinic refrigeration compressor fluids with excellent low-temperature properties. They are specifically compounded for use in ammonia refrigerant compressors. JAX CryoGuard Plus fluids also exhibits exceptional stability at high temperatures, provide extended equipment life and are compatible with the seals found in refrigeration systems.

[BACK TO TOP](#)

Gear Box Oils

Magna-Plate 220FG, 320FG, 460FG, Cylinder Oil FG

**USDANSF H1
PARTIAL SYNTHETIC**

These gear oils are white oil-partial synthetic based with sheer stable synthetic V.I. improvers. As a result, you will be able to use these in gear box applications previously thought to be too severe for food-grade lubricants. The superior operating characteristics provide reduced operating temperatures, reduced friction, and minimal gear wear. Their extremely, high-film strength offers excellent lubricity for spur, helical, spiral, bevel, planetary, and worm gears.

Magna-Plate 85W140-FG, 250-FG

**USDANSF H1
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[BACK TO TOP](#)

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Magna-Plate 60, 62, 64, 66

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FGH-AW Fluids - ISO Grades 32, 46, 68, 100TC
USDA/NSF H1

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[BACK TO TOP](#)

Greases

Poly-Guard FG-2, FG-LT

Unsurpassed Anti-Wear
USDA/NSF H1

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Other features include excellent pumpability, separation control, and easier clean-up for sanitation. Now contains Micronox® anti-microbial for true 'knock-down' performance against a broad spectrum of microbial contaminants.

Halo-Guard FG-2

Extreme High Temp - Corrosion Control
USDA/NSF H1

The latest, high performance, high temperature, food machinery grease offered by JAX. Extreme Pressure (E.P.) performance at industrial grease levels, and its remarkable corrosion inhibition properties make Halo-Guard FG the newest star for all grease lubricated applications subject to high acid products in modern fruit and vegetable processing plants.

[BACK TO TOP](#)

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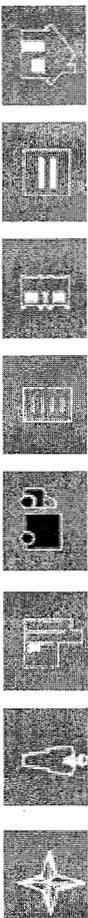
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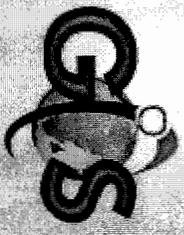
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Global Industrial Services and Associates is a company that provides solutions to satisfy the needs of the food, beverage and pharmaceutical industries. Global Industrial Services can work alone or in conjunction with other companies. This permits us to offer our clients a wide array of services through one simple contact. We are part of an integral system that proposes, plans and executes solutions.

Additionally, Global Industrial Services and Associates takes advantage of the knowledge of its staff, which accounts for more than 27 years of experience in the fields of: Production, Administration, Quality Control and Assurance, Maintenance, Logistics, Water Treatment, Planning and Construction.

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BEHNKE LUBRICANTS



Lasker Ingenieria

BEHNKE LUBRICANTS INC. / JAX

Behnke Lubricants Inc / JAX is a full-line industrial lubricant manufacturer with special emphasis on food, beverage and drug-processing plant lubrication. JAX initial foray into the food-processing industry came around 1960 at the inception of food grade lubrication and the beginning of the USDA authorization program. JAX Magna-Plate 8 was the first machinery lubricant authorized by the USDA for incidental food contact for use primarily in the heavily inspected meat-processing industry. Since that time JAX has developed nearly 150 products for use as lubricants in food-processing environments. Many products are for general equipment lubrication, and many products are custom formulated to meet specific OEM machinery requirements. JAX food-grade and food-processing lubricants are used by a diverse group of end users from bakeries to canneries, meat packers to breweries, poultry processors to soft drink plants, freezing plants to dairies, and dozens more. Virtually every member of Food Processing's Top 100 is taking advantage of JAX products and services.

Independently engineered and field tested by JAX, the Micronox® additive system is a groundbreaking advance that promises to enhance antibacterial capabilities in food and beverage plants nationwide. Micronox® will supply immediate and significant knockdown capabilities, and will be an active participant in any food or beverage plant program designed for enhanced antimicrobial protection. Through laboratory testing of competitive food grade lubricants, no other lubricants in the industry have demonstrated comparable "knockdown" performance. This distinction is important. If a bacteria, yeast or mold colony is already established, FDA/USDA/NSF approved competitor lubricants will inhibit the growth of the colony, but to actually kill the colony will require a sanitization process, or the use of JAX food-grade lubricants which incorporate Micronox® technology.

Each JAX Food Grade product has been assigned a seal according to the standards it meets, as listed on the ribbon. These seals take the guesswork out of identification of Food Grade H1 approved lubricants for plant personnel.

www.jax.com



Bvld Luis Echeverria 2586-2 Saltillo, Coahuila, México. C.P. 25270 (222) 268-4066 - Design by JorSoft

76

JAN 11 2006

Ms. Mary C. Pisculli
Regulatory & Registration Compliance Associate
Reckitt Benckier, Inc.
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NY 07054-0225

Subject: **Lysol Brand All Purpose Cleaner**
EPA Registration Number 777-89
Letter Dated October 13, 2005

Dear Ms. Pisculli:

The following amendments, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are acceptable with comments.

Proposed Labeling

- per Agency letter dated August 8, 2005

Label Comments:

1. Page 2, delete the statement "Help protect your family from cross-contamination of germs (on hard, non-porous surfaces) with Lysol Brand Disinfectant products). The Agency contends that the phrase, "Help protects the family" is misleading because it implies that the product offers health protection against germs. This type of claim is beyond the Agency's jurisdiction and the scope of this product's registration as a disinfectant that kills viruses and bacteria on hard nonporous surfaces. Alternatively, you may claim that "Lysol brand Disinfectant products aid in the reduction of cross contamination of germs on hard, non-porous surfaces.
2. Page 2, delete the claim (even odor-causing germs**).

SYMBOL	Page 4, under heading 99.9% of CONCURRENCE the word "santizing use"						
SURNAME							
DATE							

Also, the Agency has determined that a sanitizing claim against viruses is unacceptable. Therefore, a germs claim in association with sanitizing is unacceptable. You must either change the contact time to "10 minutes" or remove "germs" for the following claim:

Kills (Destroys) (Eliminates) 99.9% of germs in (60 seconds) (1 minute).** is unacceptable.

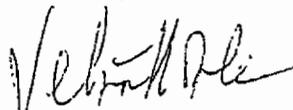
4. Page 5, you cannot mix a non public health claim such as odor causing with a public health claim, germs. Therefore, revise the claim to read "odor causing bacteria".
5. Page 5, revise the 24th and 28th claims, Kills odor-causing germs by deleting the word "odor causing germs"

General Comments:

A stamped copy of the acceptable labeling is enclosed. Submit one (1) copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Drusilla Copeland on (703) 308-6224.

Sincerely,



Velma Nobel
Product Manager (31)
Regulatory Management Branch II
Antimicrobials Division (7510C)

Enclosure

3/13

<< Front Panel >>

ACTIVE INGREDIENT:

n-Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆)	
dimethyl benzyl ammonium chlorides	1.1856%
OTHER INGREDIENTS:	98.8144%
TOTAL:	100.0000%

KEEP OUT OF REACH OF CHILDREN

WARNING: See back (side) panel for additional precautionary statements

NET CONTENTS:	15 FL. OZ.	(443 mL)
	22 FL. OZ. (1 PT. 6 OZ.)	(650 mL)
	28 FL. OZ. (1 PT. 12 OZ.)	(828 mL)
	32 FL. OZ. (1 QT.)	(946 mL)
	35 FL. OZ. (1 QT. 3 OZ.)	(1.03 L)
	40 FL. OZ. (1 QT. 8 OZ.)	(1.18 L)
	52 FL. OZ. (1 QT. 20 OZ.)	(1.53 L)
	128 FL. OZ. (1 GAL.)	(3.79 L)
	144 FL. OZ. (1.125 GAL.)	(4.26 L)

<< Front or Back Panel >>

EPA Reg. No.: 777-89
 EPA Est. No.: 777-NJ-2
 8791-MO-1
 See bottom or side (for Lot/Date code)

<< Back Panel >>

Questions? Comments? Call: (1-800-228-4722) (1-800-677-9218)
 (or) Visit us at (www.lysol.com) (www.reckittprofessional.com)
 Made in U.S.A. © RBI (year)
 Distributed by: Reckitt Benckiser Inc., Parsippany, NJ 07054(-xxxx)
 Contains no phosphates
 This (bottle) (container) is made of x% post-consumer recycled plastic.

<< Back Panel - Optional text >>

Monday - Friday, 8:45 am - 4:30 p.m. [Eastern time]
 Company Logo (Reckitt Benckiser Professional)
 Recycle Symbol
 Important facts (about this product):
 Encourage your local authorities to establish a program to recycle this (bottle) (container).

ACCEPTED
 with COMMENTS
 EPA Letter Dated:
 JAN 11 2006

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act as
 amended for the pesticide,
 registered under EPA Reg. No. 777-89

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
 The term "this product" used throughout this document may be replaced with the marketed product brand name.
 To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
 The product label must identify the specific bacteria, virus, fungus & mold:

4/13

<< Front or Back Panel - Marketing / Product Performance claims - use as bullet point or in paragraph format >>

<< Introductory 6-mos. claims: >> (Advanced) (Complete) (Improved) (New) (Unique) Formula

(Country) (Crisp Berry) (Fresh) (Green Apple) (Island) (Lavender) (Lemon) (Orange) (Pine) (Summer)
(Summer Fresh) (Breeze) (Scent) (Unfragranced) (Unscented)

(Contains:) (Made with:) (2% Pine Oil) (Fresh Carolina Pine Scent) (Genuine Pine Oil) (Pine Oil)
(Real Pine Oil) (Pure Orange Oil) (Orange Oil)

(All-in-1) (4-in-1) (3-in-1) (All Purpose) (Antibacterial) (Bathroom) (Floor) (Glass & Surface) (Kitchen)
(Multi-Action) (Multi-Purpose) (Multi-Surface) (Triple Action) (Versatile) (Cleaner) (Disinfectant) (Sanitizer)

All Purpose Cleaner

An effective (cleaner) (disinfectant) (sanitizer) on non-food contact surfaces in the {insert use sites}.

Antibacterial Action

Contains no (phosphates) (abrasives) (bleach) (or harsh acids)

Dilutable

Easy to use

Easy pour (bottle) (container)

Economy (Great) (Mega) (Super) (Trial) (Value) (Size)

Fast / Easy / Effective: Use (in) (on) (the) {insert use sites}

{Formulated} For (Hospital) (Institutional) Use

For a cleaner, fresher household

For any surface where germs are a concern

For use (in) (on) {insert use sites} (as a multi-purpose disinfectant cleaner).

Formulated for medical institution's (infection control program) needs.

Great for (kitchens) (bathrooms) (most indoor and outdoor cleaning tasks) (your toughest household messes)

Help protect your family from cross-contamination of germs (on hard, non-porous surfaces) (with Lysol Brand
Disinfectant products).

Hospital type disinfection (even when diluted) (in dilution).

Leaves (household) surfaces (clean) (deodorized).

Leaves a fresh, clean scent

Leaves no sticky residue

Leaves your (home) (house) smelling clean with a clean fresh scent.

Makes xx buckets of (cleaning) (disinfecting) (and) (sanitizing) solution.

Makes xx gallons

Makes cleaning easier (in the) (kitchen) (bathroom) (household) (all over the house)

(Mild) (Clean) (Pleasant) (Long Lasting) (Fragrance) (Scent)

Multi-(purpose) (surface) (cleaner) (disinfectant) (sanitizer)

No streaking (or filming)

Non-abrasive formula (will not scratch surfaces)

Ready to use / Concentrated (can be used in dilution)

The most (powerful) (effective) all purpose cleaner you can buy.

Use full strength or (diluted) (in dilution) (diluted in water).

Versatile (- works on a wide range of hard, non-porous surfaces.)

Will not harm septic systems.

(This product) is germicidal when used as directed for (disinfection) (and) (sanitization of non-food contact surfaces) but differs in composition from other LYSOL® brand products.

(This product) is part of a system of infection control products provided by Reckitt Benckiser, Inc. Now, more than ever, infection control is a major concern of yours, your staff and patients. People respect the LYSOL® name, recognize LYSOL® for providing quality and trusted surface cleaning and disinfection, and gain the added benefit of a clean-smelling, sanitary environment. (We invite you to call us if you have any questions or comments on our products.)

Antibacterial Action / Kills (Household) Germs**: This product has (antibacterial) (disinfecting) action and kills viruses¹ and bacteria* (even odor-causing germs**) on environmental surfaces (in your home) (in public places).

NOTE: Bracketed information is denoted as: << directive >>, {insert as noted}, {optional text}, [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

<< Front or Back Panel - Cleaning claims – use as bullet point or in paragraph format >>

Antibacterial cleaner

Antibacterial cleaning action (on hard, non-porous surfaces) (for kitchens and bathrooms) (for all over the house).

Brilliant (bright) (see-through beautiful) shine.

Cleans (and disinfects) (hard, non-porous surfaces) (all over the house) (kitchens and bathrooms).

Cleans and sanitizes non-food contact surfaces

Cleans (tough) grease and grime

Cleans (disinfects) (sanitizes) (and) (removes offensive odors from) {insert use sites}

Cleans (eliminates) stubborn (nasty) stains

Cleans everyday (tough) (kitchen) (and) (bathroom) messes (fast).

Cleans to a brilliant shine

Cleans tough soap scum

Cleans without bleaching

Contains the most powerful (effective) (fast acting) grease cutters.

(Cuts) (Cleans) (Controls) (Dissolves) grease (fast) (quickly).

Cuts cleaning time

Cuts (tough) grease and grime

Degreases (Degreaser)

Destroys (Cuts) (Powers through) (Removes) (tough) grease (and grime)

Effortlessly removes stubborn (nasty) stains

Eliminates tough (kitchen) grease and grime

Great on glass

Non-food contact sanitizing cleaner

(The) One-step cleaner (and sanitizer)

Powerful (fast acting) (effective) all purpose cleaner (degreaser and deodorizer)

(Quickly) degreases and deodorizes

(Quickly) (Destroys) stubborn (nasty) stains

(Quickly) (Effortlessly) removes (cleans) the following: {insert soils}

Removes (tough) (everyday) {insert soils}

Sparkling shine (Streak-free shine)

Starts cleaning on contact

(This product's formula) cleans and shines

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, { optional text }, [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

6/13

<< Front / Back Panel – Sanitizing non-food contact surface claims – use as bullet point or in paragraph format >>

An effective (fast acting) non-food contact surface sanitizer (for use in (insert use sites))
Great for use as a non-food contact surface sanitizer in (insert use sites).
Kills (Destroys) (Eliminates) 99.9% of bacteria***
Kills (Destroys) (Eliminates) 99.9% of bacteria even in dilution.***
Kills (Destroys) (Eliminates) 99.9% of bacteria even when diluted (in water).***
Kills (Destroys) (Eliminates) 99.9% of bacteria in (60 seconds) (1 minute).***
Kills (Destroys) (Eliminates) 99.9% of the following (household) bacteria (commonly found in kitchens)
(on hard, non-porous surfaces) in (60 seconds) (1 minute).***
Sanitizer (Sanitizes)
Sanitizes (kitchen) (household) (bathroom) (restroom) (non-food contact) surfaces in (60 seconds) (1 minute).***
Sanitizes non-food contact surfaces (even) (when diluted) (in dilution).***
Sanitizes without bleaching

This product is a sanitizer for hard, non-porous, non-food contact surface areas in 60 seconds against Staphylococcus aureus and Enterobacter aerogenes according to the Non-Food Contact Surface Sanitizer method.

<< back panel qualifier >>

***Kills (destroys) (eliminates) 99.9% of (Enterobacter aerogenes) (and) (Staphylococcus aureus) on hard, non-porous surfaces in (60 seconds) (1 minute).

<< 99.9% of GERMS*** - The following claims can only be used on products containing disinfecting and sanitizing use directions.

(front / back panel claim)
Kills 99.9% of germs***
Kills (Destroys) (Eliminates) 99.9% of germs even in dilution.***
Kills (Destroys) (Eliminates) 99.9% of germs even when diluted (in water).***
Kills (Destroys) (Eliminates) 99.9% of germs in (60 seconds) (1 minute).***

(back panel qualifier – must choose at least 1 bacteria and virus or fungi)

*** (This product) Kills 99.9% of (Enterobacter aerogenes), (Staphylococcus aureus) and (Herpes Simplex Virus Type 1 & 2), (Human Immunodeficiency Virus Type 1 [AIDS Virus]), (Respiratory Syncytial Virus), (Rotavirus WA) on hard, non-porous surfaces in (60 seconds) (1 minute).

NOTE: Bracketed information is denoted as: << directive >>, (insert as noted), (optional text), [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

<< Front or Back Panel – Disinfecting & Deodorizing claims – use as bullet point or in paragraph format >>

(Antibacterial) (Bactericidal) (Bactericide) (Deodorizer) (Deodorizes) (Disinfectant) (Disinfects)
(Germicidal) (Mildewstat) (Mildewstatic) (Virucidal¹)

A disinfecting (non-food contact surface) cleaner for use in {insert use sites}
Controls (Eliminates) (kitchen) odors caused by (bacteria*) (germs**) (mold) (and mildew)
Controls mold and mildew
Controls the growth of mold and mildew.
Disinfects (Deodorizes) (and Sanitizes) as it cleans.
Disinfects (even) when diluted with water (in dilution) (when used according to directions).
Eliminates food odors like garlic and onion that are left behind on kitchen surfaces after cooking.
Eliminates odors
Eliminates odors caused by bacteria (mold) (mildew) (and) (non-fresh foods).
Eliminates (kills) odor-causing (bacteria*) (germs**)
Fast acting (disinfectant) (sanitizer)
Kills (Destroys) (Eliminates) germs** (that ordinary cleaners don't.)
Kills (Destroys) (Eliminates) germs** while it cleans.
Kills (Disinfects) against {insert 'A - B' organisms} (when diluted) (even in dilution).
Kills germs** and controls the (spread) (growth) of mold and mildew.
Kills (kitchen) (household) (bathroom) (restroom) (germs**) (bacteria*) (viruses¹).
Kills (more than) (greater than) 99.9% of (the following) (household) germs**: {insert 'A & B' organisms} (in 10 minutes).
Kills (household) germs** in dilution.
Kills {insert 'A' organisms} commonly found in kitchens (in 10 minutes).
Kills {insert 'A - B' organisms} on hard, non-porous (kitchen) (bathroom) (restroom) (household) surfaces in 10 minutes.
Kills (eliminates) odor-causing bacteria* in the (kitchen) (bathroom) (restroom) (all around the house).
Kills odor-causing germs**
Kills viruses¹ and bacteria*
Kills viruses¹ in 30 seconds
Quickly (eliminates) (removes) (food) odors
(This product) deodorizes by killing (many) (odor-causing) germs**.
(This product) eliminates damp, musty odors in (the basement) (or) areas where air does not circulate.
(This product) helps control cross-contamination of many germs** (on) (from) treated surfaces (when used as directed).

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
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To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

<< Back Panel - Use directions – IMPORTANT: Advisory statements must be included were appropriate >>

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

General Cleaning (Deodorizing): Dilute ¼ cup [2 oz.] per gallon of warm water. Or use full strength and rinse thoroughly.

Sanitization: For non-food contact surfaces: use full strength or (dilute) 2.2 oz. per gallon of warm water. Wet all surfaces thoroughly. Let stand for 60 seconds then remove excess.

Sanitization / Disinfection: If surfaces are visibly dirty, clean first (with this product) (according to General Cleaning (Deodorizing) directions). Apply with sponge or mop (or autoscrubber) to wet all surfaces thoroughly. Rinse all food preparation areas with water. Prepare a fresh bucket of solution every time you clean or more often as needed. **Sanitization:** For non-food contact surfaces use full strength or dilute 2.2 oz per gallon of warm water. Let stand for (1 minute) (60 seconds) then remove excess. **Disinfection:** Use full strength or dilute 8.5 oz per gallon of warm water. Let stand for 10 minutes then remove excess.

Disinfection (Disinfecting): Dilute 8.5 oz. per gallon of warm water or use full strength. Wet all surfaces thoroughly. Let stand for 10 minutes then remove excess.

To Disinfect Toilet Bowl: Flush and then add 6 oz full strength into the bowl water. Thoroughly swab all bowl surfaces and under the rim. Let stand for 10 minutes and then flush again.

To Control Mold & Mildew: Use as directed for Disinfection. Repeat application when necessary.

<< Advisory Statements >>

On painted surfaces test a small inconspicuous area first.
Do not use on unfinished, oiled or waxed wood floors.
Rinse all food contact surfaces thoroughly with potable water before reusing surface.
Do not use on eating / cooking utensils, glasses / dishes or cookware.
Rinse thoroughly with potable (clean) water after disinfecting food contact surfaces.
Do not use on outdoor patio furniture cushions and pillows.

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
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The product label must identify the specific bacteria, virus, fungus & mold.

9/13

<< Hoover® Automatic Floor Machine / Lysol® Floor Cleaner directions >>

General Cleaning: For use on hard non-porous floors. Add 2.2 oz of (this product) to 30 oz of water to make 32.2 oz of cleaning / disinfecting solution. Apply (with Hoover® Floor Mate™ machine) (according to Hoover® Floor Mate™ instructions). **Sanitization*:** Let stand for 60 seconds. **Disinfection:** Let stand for 10 minutes, then remove excess. Prepare a fresh solution every time you clean or more often as needed. For heavily soiled floors, clean before sanitizing and disinfecting. **DO NOT USE ON UNFINISHED, OILED OR WAXED WOOD FLOORS. DO NOT USE WITH HOOVER® STEAM VAC™ OR OTHER CARPET EXTRACTORS.**

*Kills 99.9% of Staphylococcus aureus on hard, non-porous surfaces in 60 seconds.

<< Hoover® Automatic Floor Machine / Lysol® Floor Cleaner Marketing Claims >>

Where to Use: Great for use on a variety of flooring including hard, non-porous floor surfaces such as (plastic laminate, vinyl & glazed ceramic tile) and limited to floor surfaces listed on label.

Cleans & Disinfects

For use with Hoover® Floor Mate™ Hard Floor Cleaner

Removes tough stains

Recommended by Hoover®

Hoover®, Circle Hoover™, Floor Mate™ and Steam Vac™ are trademarks of the Hoover Company.

Hoover® logo

Made in Canada

EPA Est. No. 777-CN-1

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

10/13

<< Back Panel >>

<< IMPORTANT: All organisms must be identified by genus & species.
Abbreviations may be included but must appear in (parens), >>

<< Hard non-porous surfaces >>

<< A. 10-min. Disinfection against Bacteria >>

Enterococcus faecalis
Escherichia coli (E.coli)
Listeria monocytogenes (Listeria)
Pseudomonas aeruginosa (Pseudomonas)
Salmonella choleraesuis (Salmonella)
Staphylococcus aureus (Staph)
Streptococcus pyogenes (Strep)

<< B. 10-min. Disinfection against Virus >>

Herpes Simplex Virus Type 1 & 2
Human Immunodeficiency Virus Type 1 [HIV-1] [AIDS Virus]
(HIV-1 was tested in the presence of 10% Fetal bovine serum)
Respiratory Syncytial Virus (RSV)
(- an important cause of ear infections in children)
(- the leading cause of lower respiratory infection in children)
Rotavirus WA
(- the leading cause of infectious diarrhea in children)

<< 30-sec. Disinfection against Virus: >>

Herpes Simplex Virus Type 1 & 2
Human Immunodeficiency Virus Type 1 [HIV-1] [AIDS Virus]
Respiratory Syncytial Virus (RSV)
Rotavirus WA

<< C. Mildewstatic against Mold & Mildew >>

Aspergillus niger (mold & mildew)

<< *** 60-sec. Sanitization against Bacteria >>

Enterobacter aerogenes
Staphylococcus aureus (Staphylococcus)

Symbol Designation – used on product labels:

Single asterisk (*)	bacteria*	used for identifying disinfection against specific bacteria.
Dagger (†)	viruses†	used for identifying disinfection against specific viruses.
Double asterisk (**)	germs**	used for identifying disinfection against specific bacteria and virus or fungi.
Triple asterisk (***)	sanitizes***	used for all claims of sanitization

NOTE: Bracketed information is denoted as: << directive >>, { insert as noted }, (optional text), [required qualifier].
The term "this product" used throughout this document may be replaced with the marketed product brand name.
To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

11/13

<< Back Panel >>

<< Soil / Surface / Use Site - May be listed on product label in plural form >>

Soils: (Graphic – depicting soil)

Bathtub Rings	Dirt	Grease	Mud
Beverage Stains	Fingerprint	Grime	Oil
Blood Stains	Food Stain	Heel / Scuff Mark	Outdoor Grime
Crayon / Pencil Mark	Grass Stain	Mildew Stain	Soap Scum

Surface Types:

Acrylic	Fiberglass Fixtures	Marble (Cultured)	Plexiglas*
Brass	Glass	Marble (Synthetic)	Slate
Chrome^	Glazed Ceramic	Metal	Stainless Steel^
Concrete / Cement	Glazed Porcelain	Mirror	Terra Cotta
Copper	Granite	Parquet	Tin
Crystal	Laminate	Plastic	Vinyl
Enamel	Linoleum		

^Non-Medical or Fixture

*Plexiglas is a registered trademark of the Atofina Corporation.

Surfaces: (Graphic – depicting use site)

Appliance Exterior	Garbage (Can) (Pail)	Range Hood
Bathtub (Tub)	Glass Topped Furniture	Refrigerator / Freezer Exterior
Bed Frame	Glazed Ceramic Tile	Shelves (Drawers)
Cabinet (non-wood)	Glazed Porcelain Tile	Shower (Door)
Chair (non-wood)	Grill (Bar-B-Que) Exterior	Shower (Stall) (Area)
Changing Table (non-wood)	Highchair (non-food contact area)	Sink (Basin)
Counter (Countertop)	Light Fixture	Stove (Stovetop)
Crib (non-wood)	Metal Blinds	Table (Tabletop) (non-wood)
Diaper Pail (non-wood)	Microwave Exterior	Telephone
Door Knob (Handle)	Non-medical (Chrome)	Tires
Exhaust (Fan) (Hood)	Non-medical (Stainless Steel)	Toilet Bowl Exterior / Urinal
Fixture (Chrome)	Outdoor Patio Furniture (non-wood)	Tools
Fixture (Stainless Steel)	Oven (Door)	Vanity Top
Floor (Glazed Ceramic Tile)	Painted Woodwork	Washable (Wall) (Wallpaper)
Floor (Linoleum)	Piano Keys	Water Fountain
Floor (No-wax)	Picnic Table (non-wood)	Window (Windowsill)
Floor (Vinyl)	Plastic Laundry (Basket) (Hamper)	Windshield

Household Use Sites: (Graphic – depicting use site)

Basement	Dining Room	Kitchen	Nursery
Bathroom	Family Room	Laundry Room	Playroom
Bedroom	Garage	Living Room	Storage Area / Room
Den / Study	Home / House	Mud Room	Tool Shed

Professional Use Sites: (Graphic – depicting use site)

Cafeteria	Health Care Facility	Kitchen	Restaurant
Day Care Center	Hospital	Nursing Home	Restroom
Dental Office	Hotel / Motel	Office Building	School (College)
Doctors Office	Kennel	Physicians Office	Veterinary Office

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To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms.
The product label must identify the specific bacteria, virus, fungus & mold.

12/13

<< Back Panel - IMPORTANT: The following is required for professional products making claims against >>

<< Human Immunodeficiency Virus Type 1 [HIV-1] [AIDS Virus] >>

KILLS HUMAN IMMUNODEFICIENCY VIRUS TYPE 1 [HIV-1] [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 HIV-1 [associated with AIDS].

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES / OBJECTS SOILED WITH BLOOD / BODY FLUIDS:

PERSONAL PROTECTION: When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks or eye coverings.

CLEANING PROCEDURES: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this product.

CONTACT TIME: Allow surface / object to remain wet for 30 seconds.

DISPOSAL OF INFECTIOUS MATERIALS: Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal.

<< Terminal Sterilant Statement – qualified metal surfaces >>

This product is not for use on critical & semi-critical medical devices or medical equipment surfaces.

<< Terminal Sterilant Statement – unqualified metal surfaces >>

This product is not to be used as a terminal sterilant / high level disinfectant on any surface or instrument that ⁽¹⁾ is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body; or ⁽²⁾ contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enters 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.

<< Animal Care Facilities >>

For Use in Veterinary Clinics, Animal Care and Animal Laboratories: For cleaning and disinfecting the following hard, non-porous surfaces: equipment, utensils, instruments, cages, kennels, etc. Remove all animals and feeds from the premises, crates, cages and enclosures. Remove all litter, droppings and manure from floors, walls and surfaces occupied or traversed by animals. Empty all troughs, racks and other feeding / watering appliances. Thoroughly clean all surfaces with soap or detergent and rinse with water. Saturate surface with a use solution of 8.5 oz per gallon of warm water. Allow surface to remain wet for 10 minutes. Ventilate buildings and other closed spaces. Do not house animals or employ equipment until treatment has been absorbed, set or dried. Thoroughly scrub all treated feed racks, automated feeders and watering appliances with soap or detergent and rinse with potable water before reuse.

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<< Back Panel >>

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

WARNING: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. If you have sensitive skin wear rubber gloves.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• 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 a Poison Control Center or doctor for treatment advice.
CONTACT NUMBER	
Questions? Comments or in case of an emergency, call toll free (1-800-228-4722) (1-800-677-9218). Have the product container or label with you when calling a Poison Control Center, or doctor, or going for treatment.	

<< Storage and Disposal language – Household containers >>

STORAGE AND DISPOSAL: Store in areas inaccessible to small children. Keep securely closed. Do not reuse container. Rinse empty container thoroughly and discard in trash or recycle.

<< Storage and Disposal language – Professional containers 1 gallon or less >>

STORAGE AND DISPOSAL

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

STORAGE: Store in areas inaccessible to small children. Keep securely closed.

DISPOSAL: Do not reuse container. Rinse empty container thoroughly and discard in trash or recycle.

<< Storage and Disposal language – Professional containers greater than 1 gallon >>

STORAGE AND DISPOSAL

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

STORAGE: Store in original container in areas inaccessible to small children. Keep securely closed.

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 DISPOSAL: Triple rinse or equivalent. Then offer for recycling 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.

<< Environmental Hazard language – Professional (container sizes 5 gallon or larger) >>

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, estuaries, ponds, oceans or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the Local Sewage Treatment Plant Authority. For guidance contact your State Water Board or Regional Office of the EPA.

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