

UNITED STATES ENVIRONMENTAL PROTECTI AGENCY

Juli Mann Steptoe & Jonson 1330 Connecticut Ave, NW Washington DC 20036-1795

JUN 14 201

SUBJECT:

Microl Preservative EPA Registration Number: 82076-1 Application Dated: May19, 2011 Receipt Date: May, 20, 2011

Dear Ms. Mann:

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.

- Update the Container Disposal statement per Pr notice 2007-4
- Update the registrant name and address per EPA approval dated June 23, 2010.
- Add the following alternate marketing language:
 - a. Petro-Canada Agent #251
 - b. Petro-Canada is a Suncor Energy business
 - c. TM Trademark of Suncor energy Inc. Used under licence

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.

General Comments

Should you have any questions concerning this letter, please contact Emilia Oiguenblik at (703) 347-0109 or Velma Noble at (703).308-6233.

Sincerely.

Product Manager (31) CONCURRENDES tory Management Branch I SYMBOL SURNAME DATE

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

OFFICIAL FILE COPY

Pleuse read instructions	on roverse hetore comp	. C	P		D N- 0070 0040	
EPA	Environmenta	ited States Il Protection Ag gton, DC 20460			gistration nendment her	, Approval expires 2-28-95 OPP Identifier Number
	A	pplication for F	Pesticide – S			
1. Company/Product Nu 82076-1	umber	<u></u>	2. EPA Produ Velma Noble			Proposed Classification None Restricted
4. Company/Product (N MICROL Preservative		PM#				
5. Name and Address o Petro-Canada Lubricant 385 Southdown Rd. Mississauga, Ontario L5	f Applicant (Include ZIP Cod s Inc., A Sencor Energy busi 5J 2Y3 Canada Check if this is a new addres	iness	6. Expedite	oduct is similar lo		FIFRA Section 3(c)(3) composition and
			ion - II	ne		
Notification – Exp	esponse to Agency letter date	ed	Fin Age "M Oth	al printed labels in ncy letter dated e Too" Applicatic er – Explain Belc	 on	· · · · · · · · · · · · · · · · · · ·
40 CFR §§ 152.46, 15 Confidential Statement statement to EPA. I fu 156.140, 156.144, 156 penalties under sectio	nsistent with the guidance 56.10, 156.140, 156.144, 1 Int of Formula for this produ Inther understand that if the 6.146, and 156.156, this p Ins 12 and 14 of FIFRA. ESPONDENCE for this a 0036.	156.146, and 156.15 uct. I understand tha e amended label is r product may be in vic	56. No other ch at it is a violatio not consistent olation of FIFR.	anges have bee n of 18 U.S.C. S with the requirer A and I may be	en made to the la Sec. 1001 to will ments of 40 CFF subject to enford	abeling or the fully make any false R §§ 152.46, 156.10, cement action and
		Secti	ion - III			
1. Material This Production Child-Resistant Packaging Yes	uct Will Be Packaged In: Unit Packaging Yes No		Soluble Packag	ng	2. Type of Con Metal Plastic	ntainer
No * Certification must be submitted		o. per If "Yes		No. per Container	Glass Paper	cify)
* Certification	Unit Packaging wgt. Contents Information 4.	o. per If "Yes	s" ging wgt.		Glass Paper Other (Spe 5. Location of I On Label	Label Directions
* Certification must be submitted 3. Location of Net Cont Label	Unit Packaging wgt. Contents Information 4.	o. per If "Yes ontainer Packag Size(s) Retail Contai	s" ging wgt.		Glass Paper Other (Spe 5. Location of I On Label On Labelin	···
* Certification must be submitted 3. Location of Net Cont Label	Unit Packaging wgt. Container	o. per If "Yes ontainer Packag Size(s) Retail Contai 5 kg Lithograph Paper Glued Stenciled	s" ging wgt.	Container	Glass Paper Other (Spe 5. Location of I On Label On Labelin	Label Directions
* Certification must be submitted 3. Location of Net Cont Label . 6. Manner in Which La	Unit Packaging wgt. Container bel is Affixed to Product	o. per ontainer If "Yes Packag Size(s) Retail Contai 5 kg Lithograph Paper Glued Stenciled Stenciled Stenciled Fidentification of indiv	s" ging wgt. iner ion - IV vidual to be con	Container	Glass Paper Other (Spe Control of I On Label On Label On Labelin	Label Directions g accompanying product application) e No. (Include Area Code).

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

SΓΕΡΤΟΕ & JOHNSON ^{μν} ATTORNEYS AT LAW

WRITER'S DIRECT DIAL 202.429.3095

1330 Connecticut Avenue, NW Washington, DC 20036-1795 Tel 202.429.3000 Fax 202.429.3902 steptoe.com

May 19, 2011

Via HAND DELIVERY

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

Attention: Velma Noble Product Manager, Team 31 Antimicrobials Division

Re: MICROL Preservative (EPA Reg. No. 82076-1) Notification of Label Changes per PR Notices 2007-4 and 98-10

Dear Velma:

On behalf of our client, Petro-Canada Lubricants, Inc., enclosed please find a notification for MICROL Preservative to update the container disposal statements per PR Notice 2007-4 and make the following corrections per PR Notice 98-10:

- Update the registrant name and address per EPA approval dated June 23, 2010;
- Add the following alternate marketing language:
 - Petro-Canada Agent #251 [Note: This is a SKU identifier.]
 - Petro-Canada is a Suncor Energy business
 - TM Trademark of Suncor Energy Inc. Used under licence.

This notification is consistent with the guidance in PR Notice 2007-4 and PR Notice 98-10. Enclosed is EPA Form 8570-1, with the required certification statement, along with one copy of the proposed label with changes highlighted. Please let me know if you have any questions or need is anything further.

Regards, Juli Mann

[PETRO-CANADA AGENT #251] MICROL PRESERVATIVE An Antimicrobial Preservative for Industrial Use in Food Grade Lubricating Oils

KEEP OUT OF REACH OF CHILDREN DANGER

	99.98% ents
otal	
FIRST AID: Have the proc	duct container or label with you when calling a poison control center or doctor, or going for treatment.
lf 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 a poison control center or doctor for treatment advice.
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth, if possible. Call a poison control center or doctor for further treatment advice.
If swallowed	 Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
lf on skin or clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

EPA Reg. No. 82076-1 EPA Establishment No. 082076-CAN-001 Net Contents: 25 kg (55.1 lb) Petro-Canada Lubricants Inc., a Suncor Energy business

385 Southdown Rd., Mississauga, Ontario L5J 2Y3 Canada

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS: DANGER. Causes irreversible eye damage. Harmful if swallowed or absorbed through the skin. Do not get in eyes or on clothing. Avoid contact with skin. Wear safety glasses or goggles and protective gloves made of butyl rubber, PVC, or neoprene. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System Permit (NPDES) and the permitting authority has been notified prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. MICROL* Preservative should be added to the mineral oil component of lubricants compliant with 21 CFR 178.3570 at a maximum level of 1.0%, in order to prevent decomposition and odors in the lubricant caused by microorganisms. Add MICROL* Preservative at any convenient time during the mixing process. No finished products containing MICROL* Preservative may make any public health claims relating to antimicrobial activity without EPA pesticide registration. When incorporated into lubricant, this product does not protect users of any such treated article or others against foodborne or disease causing bacteria, viruses, germs or other disease causing organisms. This product is compliant with 21 CFR 184.1021.

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep product dry during storage.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. When empty, offer for recycling if available, or dispose of liner and drum in a sanitary landfill or by incineration if allowed by state and local authorities.

Petro-Canada is a Suncor Energy business

Trademark of Suncor Energy Inc. Used under licence.

ì NI: PETRO-CANAL STRATO, CS URENT FEROCENSION PRESERVATIVE KEG LABEL DUBECT: 4.3 4 KG MICROL PRESERVATIVE KEG LABEL ROJECT DATE: MARCH 31/26 | BARCODE; DOKCHT NO: KOOZ SIZE: 7* 6* CALE: PRINTED AT 100% OF ACTUAL SIZE | DISTORTED; YES XNO PRINTED ON: C HITE STUCK (II) ιξιι ... ARCODE: 610016/2 (IEFACES 630016/1) LAST EEVISION DATE: JUNE 7/06 (COPY EEVISION), JUNI 23/06 (COPY REVISION), JUNY 21/06 (IEW EFA NUMBER), SEPT 12/06 (COPY REVISION), NOV. 2/06 (COPY REVISION), NOV. 7/06 (COPY REVISION), NOV. 2/06 (COPY REVISION) ι LLLLL 45 DAWEON CREECENT DECREETOWN DUTARIC 175 1H3 161 -005) 703-7981 aria

L30028/2