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April 7, 2016

By e-mail (pdf): tsb@dot.gov

Associate Administrator for Enforcement
National Highway Traffic Safety Administration
Attn: Early Warning Division (NVS-217)
1200 New Jersey Ave., SE 20590

Re: Pennzoil-Quaker State Company dba SOPUS Products

Dear Administrator:

On behalf of Pennzoil-Quaker State Company dba SOPUS Products, please see attached documents pursuant to 49 CFR 579.5.

Very truly yours,

DYKEMA GOSSETT PLLC

Paul M. Laurenza

Enclosures

From: Barrett, Courtney D SLUBE-DIU/82
Sent: Friday, March 25, 2016 3:36 PM
To: Americas Lubricants News Desk
Cc: Moser, Don D SLUBE-DIU/824; Barrett, Courtney D SLUBE-DIU/82
Subject: PLEASE READ: Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant Product Return Program

Dear SOPUS Products Customer or Distributor:

SOPUS Products places great importance on providing quality products that meet all federal and state regulations. As such, SOPUS Products is requesting the return of **all batches of one gallon bottles and 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant and one batch (B2811293U063/30Sept15) of 55-gallon drums of Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate** currently in the marketplace because these products were undertreated with bitterant, an additive used to render the product unpalatable. Both of these products are formulated to be extended-life antifreeze/coolants in the heavy-duty engines found in on- and off-highway vehicles, and in marine, farm, mining and construction equipment. You have received this email because our records indicate that you have purchased one or both of the affected products.

After reviewing the details in the attached letter, please locate and remove any affected products from your inventory and segregate them from saleable products, marking them for return/recycle to prevent unintended sale. **(Please note:** if any of these products are already installed in a cooling system, they do not need to be drained or replaced; it is important to note that the lack of bitterant has **no impact** on product performance. The Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant does have warnings on the label and child-resistant closures.)

Also attached is a letter template for notifying *your* customers of this issue. For customers that sell Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant at retail locations, we have attached a notice that can be printed and posted near the cash register or on-shelf to help reach consumers. Later today, we will reach out to relevant trade media in a further effort to reach end-users. We have also set up a website to manage customer and consumer inquiries around this issue: <http://rotella.shell.com/products/shell-rotella-ultra-elc-product-return.html>.

We regret any inconvenience this request may cause you, and we appreciate your help in locating and quarantining the affected product. We recognize that this is a holiday weekend, so to ensure that you receive this information, we will re-send it to you on Monday morning.

If you have any questions, please contact your SOPUS Products account manager.

Kind regards,
Courtney Barrett

Courtneye D. Barrett

Network Communications Consultant
Shell Lubricants Americas

One Shell Plaza, Houston, Texas

office: 713-241-5895

mobile: 832-205-6386

courtneye.barrett@shell.com



SOPUS Products

910 Louisiana St.
Houston, TX 77002

Internet <http://www.shell.com>

March 25, 2016

Dear SOPUS Products Customer:

SOPUS Products is initiating a product return program for the following products currently in the marketplace because these products were undertreated with bitterant, an additive used to render the product unpalatable. The Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant does have warnings on the label and child-resistant closures.

- One gallon bottles of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant --- ALL BATCHES
- 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant --- ALL BATCHES
- Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate sold in 55-gallon drums -Batch Number B2811293U063/30Sept15 (SOPUS Products Material # is 550022381)

This issue *is not* related to the performance of any of these products. If any of these products have already been installed in a cooling system, they will provide the intended performance benefits and do not need to be drained or replaced.

As part of the product return process, our customer operation team has created a return policy for a return of product. Full details are available by visiting www.rotella.com/productreturn or product return can be started by following the steps below.

1. Contact SOPUS Products Customer Service Center (CSC) to submit a return order.
2. Specify the SKUs and quantities to be returned as well as the Account Number for the location where the product will need to be picked up from.
3. Inform the CSC representative that the return is due to the issue with:
 - a. One gallon bottles of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant - ALL BATCHES; and/or
 - b. 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant - ALL BATCHES; and/or
 - c. Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate sold in 55-gallon drums - Batch Number B2811293U063/30Sept15 (SOPUS Products Material # is 550022381)
4. The CSC Representative will then provide details for product pick-up or recycle, and return credit.

In the meantime, we ask that you locate and remove these specific products from your inventory and segregate them from saleable products marking it for return/recycle to prevent unintended sale.

SOPUS Products Customers
March 25, 2016

We regret any inconvenience this request may cause you, and we appreciate your help in locating and quarantining the affected product.

If you have any questions about this situation, please contact your SOPUS Products account manager.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rusty Barron". The signature is fluid and cursive, with the first name "Rusty" being more prominent than the last name "Barron".

Rusty Barron

Vice President, North America Marketing
SOPUS Products

Shell ROTELLA Ultra ELC Extended Life Engine Coolant/Antifreeze Product Return Program
Letter Template for Alerting Customers'/Distributors' Customers

March 25, 2016

Dear Customer:

SOPUS Products is initiating a product return program for the following products currently in the marketplace because these products were undertreated with bitterant, an additive used to render the product unpalatable. The Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant does have warnings on the label and child-resistant closures.

- One gallon bottles of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant - ALL BATCHES
- 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant - ALL BATCHES
- Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate sold in 55-gallon drums- Batch Number B2811293U063/30Sept15 (SOPUS Products Material # is 550022381)

This issue *is not* related to the performance of any of these products. If any of these products have already been installed in a cooling system, they will provide the intended performance benefits and do not need to be drained or replaced.

As part of the product return process, we ask that you locate and remove these specific products from your inventory and segregate them from saleable products marking it for return/recycle to prevent unintended sale.

[If the customer purchased the product from a distributor, they should follow the distributor's return process. Please insert the Distributor return instructions here]

We regret any inconvenience this request may cause you, and we appreciate your help in locating and quarantining the affected product.

If you have any questions about this situation, please contact _____ at _____.

Sincerely,



Have you purchased any one gallon bottles of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant recently?

If so, please call **1-855-302-4572** or visit **www.shellrotella.com** for important product information because the product was undertreated with bitterant. Bitterant is an additive intended to make the product unpalatable. The Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant does have warnings on the label and child-resistant closures.

If the product is already installed in a cooling system, it is important to note that the lack of bitterant has ***no impact*** on product performance, and the product does not need to be drained or replaced.

Shell Rotella Facebook

March 25, 2016



Shell Rotella

March 25 at 4:45pm · W

SOPUS Products is requesting return of all batches of one gallon bottles and 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant and one batch (B2811293U063/30Sept15) of 55-gallon drums of Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate currently in the marketplace because these products were undertreated with bitterant, an additive used to render the product unpalatable.

The products are formulated to be extended-life antifreeze/coolants in the heavy-duty engines found in on- and off-highway vehicles, and in marine, farm, mining and construction equipment.

If any of these products are already installed in a cooling system, they do not need to be drained or replaced; it is important to note that the lack of bitterant has no impact on product performance. The Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Coolant does have warnings on the label and child-resistant closures.

If there is any remaining or unused product, we are recommending that this product be identified and moved to a safe, tamper-free location in preparation for return or recycle.

Consumers who have product in their possession should visit www.ROTELLA.com/productreturn to begin a claim process. Open product should then be taken to their local recycling facility or auto parts store to be recycled. Additional instructions around recycling can be found at www.earth911.com/recycling/how-to-recycle-automotive-fluids/.

Shell ROTELLA® Ultra ELC Product Return

SOPUS

ROTELLA.SHELL.COM



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Shell Rotella Twitter

March 25, 2016



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Shell Rotella

@ShellRotella

Shell Rotella® engine oils help hard working people keep their trucks and equipment operating properly. For more information visit rotella.com.

Tweets Tweets & replies Photos & videos



Shell Rotella @ShellRotella · Mar 25

Product return of all ROTELLA Ultra ELC 50/50 Coolant gallon bottles. No harm to coolant systems. Details: bit.ly/1LNc5np



[View summary](#)

**Shell ROTELLA Ultra ELC Extended Life Antifreeze/Coolant Product Return
Information Sheet
March 31, 2016**

SOPUS Products is initiating a product return for all batches of one gallon bottles and 55-gallon drums of Shell ROTELLA Ultra ELC 50/50 Pre-diluted Antifreeze/Engine Coolant and one batch (B2811293U063/30Sept15) of 55-gallon drums of Shell ROTELLA Ultra ELC Antifreeze/Coolant Concentrate currently in the marketplace because these products were undertreated with bitterant, an additive used to render the product unpalatable.

Shell ROTELLA Ultra ELC 50/50 Pre-diluted and Shell ROTELLA Ultra ELC Concentrate Antifreeze/Engine Coolants are formulated to be extended-life antifreeze/coolants in the heavy-duty engine cooling systems found in on- and off-highway vehicles, and in marine, farm, mining and construction equipment.

Q&As:

What does the affected product bottle look like?



What is the issue with these products?

These products were undertreated with bitterant, an additive used to render the product unpalatable.

What is bitterant?

Bitterant is a chemical compound added to anti-freeze/coolant to make the product unpalatable (make it taste bad).

What should we do with the Shell ROTELLA Ultra ELC 50/50 Pre-Diluted Antifreeze in our possession?

- Return kit(s) (boxes and return labels) will be sent to each location for the affected product.

If you do not receive a return kit by April 16, 2016 call **+1-855-302-4572** to have a return kit shipped to your location. Have the following information ready:

- Full Business name and address
- Contact information for your location
- Quantity of unopened product in your possession
- Any open product should then be taken to their local recycling facility or auto parts store to be recycled. Additional instructions around recycling can be found at www.earth911.com/recycling-guide/how-to-recycle-automotive-fluids/.

*****Affected product should be pulled off the shelf and quarantined until the return kit is received.*****

- Once the return kit is received:
 - Pack unopened product (6) to a box
 - Securely seal each box with packing tape
 - Securely affix a postage paid UPS return label to each box (to be provided to you)
 - Send the closed boxes via UPS to the address on the UPS label. Call your local UPS office to arrange pick up.
- If you have any questions about this process, please call **+1-855-302-4572**

Thank you for your cooperation.