



ArcelorMittal

ArcelorMittal Shelby

RE:

- Restriction of Hazardous Substances-RoHS 3-Recast Directive 2011/65/EU and 2015/863 EU Directive
- REACH
- End of Life Vehicle Directive 2000/53/EC; 2008/33/EC; 2008/112/EC; 2011/37EU
- Global Automotive Declarable Substances List (GADSL) 16th of February. 2016 Revised February 2018

To Whom It May Concern

The European Union has issued various directives such as the Restriction of Hazardous Substances in electrical and electronic equipment (RoHS 3) Recast Directive 2011/65/EU and 2015/863/EU. The EU also initiated REACH, the automotive End of Life Vehicle (ELV) Directive 2000/53/EC; 2008/33/EC; 2008/112/EC and Annex II (2011/37/EU). This letter addresses all substances restricted under one or more of those directives. Ten (10) restricted substances are also described in the Global Automotive Declarable Substances List (GADSL): Lead, mercury, cadmium, Hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP), and Diisobutyl phthalate (DIBP).

Subject: Mechanical Steel Tubing Manufactured in Shelby, Ohio:

ArcelorMittal Tubular Products USA LLC steel tubing may be used in some electrical equipment (Electrical Motor Housings). Our products are made from carbon and low-alloy steels. All Steels contain some Cadmium and Lead, at residual impurity levels. Scrap metal contains residual levels of various metals being remelted, and/or residual levels of metals that are found in the ores being used to manufacture the steel. These residual levels or trace metals can contain Cadmium and Lead. **Below is an explanation for some of the substances of interest under these directives:**

Cadmium: The levels of Cadmium in steel are less than 0.010 percent. The Cadmium concentration present is entirely due to residual levels in the steel.

Lead: The levels of Lead in steel are less than 0.001 percent. The Lead concentration present is entirely due to residual levels in the steel.

Mercury: Not used or present in our products.

Hexavalent Chromium: Not used or present in our products.

Polybrominated Biphenyls (PBB): Not used or present in our products.

Polybrominated Diphenyl Ethers (PBDE): Not used or present in our products.

Bis(2-ethylhexyl) phthalate (DEHP): Not used or present in our products.

Butyl benzyl phthalate (BBP): Not used or present in our products.

Dibutyl phthalate (DBP): Not used or present in our products.

Diisobutyl phthalate (DIBP): Not used or present in our products.

REACH STATEMENT

Classification: Alloy, Carbon or HSLA Steel Tubing is considered an article under REACH Regulation (EC) No 1907/2006 and is not subject to classification under REGULATION (EC) No 1272/2008. ArcelorMittal Tubular Products USA LLC's products & coatings applied DO NOT contain any of the substances from the REACH Candidate List or REACH Substances of Very High Concern (SVHCs), according to the current appropriate European thresholds. As of the date of this certification, notification is not required.

RoHS Declaration

Current RoHS 3 (EU 2015/863) expanded the list of prohibited substances from 6 to 10. These 10 substances are specifically addressed in this letter. As of the date of this letter, ArcelorMittal Tubular Products USA LLC products are RoHS Compliant.

GADSL STATEMENT:

ArcelorMittal Shelby products are made from carbon and low alloy steel. Heavy metals on the Substances of Concern List are present at residual levels stated above and are not added as alloying elements. These products & coatings applied DO NOT contain declarable metals in weight % $\geq 0.1\%$ or any other substances on the Substances of Concern List.

Name (print or type): David C. Monnin

Signature: 

Title: Mgr. Chemical & Environmental Control

Date: July 1, 2021

The information in this certification document is provided for the general information of customers and does not imply any warranty. The interpretation and/or use of this information are the sole responsibility of the user(s). This information is provided to you on the following conditions: (1) ArcelorMittal Tubular Products USA LLC makes no representations or warranties as to any tests used in preparing this certification. (2) ArcelorMittal Tubular Products USA LLC shall not be liable to you or any other person for the performance, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this certification, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or any other basis; (3) you agree to hold ArcelorMittal Tubular Products USA LLC harmless against all liability that may be imposed on it in connection with this certification, the manufacturer of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.
