

# **CERTIFICATE OF COMPLIANCE**

## European Environmental Legislation-RoHS Directive 2011/65/EU

Company Name: _ArcelorMitta	l Tubular Products Marion
Company Location: _Marion, Ohio USA	
I (we) hereby certify the metals and materials supplied are in compliance with the above directive.	
It is understood that any leaded steel or brass material supplied would not conform to the directive, and are exempt from this certificate.	
☑ (Check here if you conform)	
☐ (Check here if you do not conform and explain below)	
Reason for non-conformance:	
Your Name (print or type):	Bill Berry
Your Signature:	fll Kery
Your Title:	Environment, Health & Safety Coordinator
Date:	September 4, 2014

Classification of the chemical: Carbon or HSLA Steel Tubing is considered an article under Reach regulation (Reach Regulation (EC) No 1907/2006 and is not subject to classification under CLP regulation (REGULATION (EC) No 1272/2008).



### RE:

- Restriction of Hazardous Substances-RoHS 2-Recast Directive 2011/65/EU
- End of Life Vehicle Directive 2000/53/EC-last consolidated on April 20, 2011
- Global Automotive Declarable Substances List (GADSL) Feb. 1, 2012

## 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 2) Recast Directive 2011/65/EU. This directive entered into force on the 21<sup>st</sup> of July 2011 and requires Member States to transpose the provisions into their respective national laws by the 2<sup>nd</sup> of July 2013. The EU also initiated the automotive End of Life Vehicle (ELV) Directive 2000/53/EC Annex II (2011/37/EU). This informational letter addresses six (6) restricted substances restricted under one or more of those directives: Lead, mercury, cadmium, Hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE). These six (6) restricted substances are also described in the Global Automotive Declarable Substances List (GADSL).

## Subject: Mechanical Steel Tubing: Manufactured in Marion, Ohio:

ArcelorMittal Tubular Products Marion manufactures mechanical steel tubing that is used in many applications. It is possible that our steel tubing might 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 levels. The 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 the elements/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 as previously described.

#### .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 as previously described.

#### Mercury:

ArcelorMittal Tubular Products Marion products DO NOT contain Mercury, or come in contact with Mercury bearing instruments or processing chemicals.

#### **Hexavalent Chromium:**

ArcelorMittal Tubular Products Marion products DO NOT contain Hexavalent Chromium.

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

<u>Polybrominated Diphenyl Ethers (PBDE):</u> Not used or present in our product.

Your Name (print or type): Bill Berry

Your Signature: Kell Derey

Your Title: Environment, Health & Safety

Coordinator

Date: September 4, 2014

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