



ArcelorMittal

September 26, 2017

RE:

Restriction of Hazardous Substances 2002/95/EC (Jan. 27, 2003)

Recast Directive 2011/65/EU aka RoHS 2 (June 8, 2011)

Revision to Annex II 2015/863 aka RoHS 3 (March 31, 2015)

To Whom It May Concern:

The European Union has issued various directives that control substances of concern. One such directive is the Restriction of Hazardous Substances in electrical and electronic equipment. There have been two main revisions to this directive: (RoHS 2) Recast Directive 2011/65/EU and the Revision to Annex II 2015/863. This informational letter addresses ten (10) substances restricted under one or more of those Directives.

1. Lead
2. Mercury
3. Cadmium
4. Hexavalent Chromium
5. Polybrominated biphenyls (PBB)
6. Polybrominated Diphenyl ethers (PBDE)
7. Bis(2-ethylhexyl) phthalate (DEHP)
8. Butyl Benzyl phthalate (BBP)
9. Dibutyl phthalate (DBP)
10. Diisobutyl phthalate (DIBP)

These ten (10) restricted substances are also described in the Global Automotive Declarable Substance List (GADSL).

We do not routinely analyze for the presence of these hazardous substances because they are not a part of the manufacturing process, add no inherent quality to the product, and are typically, if present, below threshold concentrations:

1. *Lead and cadmium are inherent in steel as a residual material. Lead may be present below the 0.100% max (1000 ppm). Lead in a galvanized coating may be present below the 0.1% max (1000 ppm). Cadmium may be present below the 0.01% max (100 ppm). Cadmium may be present in a galvanized coating below the 0.01% max (100 ppm). Mercury, if present, would be below the 0.1% (1000 ppm). Chromium is routinely added to certain steel products but our manufacturing process prevents the formation of the chromium+6 phase in the final product, with the exceptions noted below.
2. Environmentally persistent transformer fluids / flame retardants are not a part of the steel making process.
3. The last four chemicals are phthalates. Phthalates are a family of chemicals used to soften and increase the flexibility of plastic and vinyl and are not a part of the steel making process.

This letter applies to ArcelorMittal USA light flat rolled and plate products only.

We are currently compliant in our following products:

- 1) Hot Rolled and Cold Rolled Steel Sheet (Dry or oiled)
- 2) Hot Dipped Galvanized/Galvannealed (Dry or oiled)
- 3) Galvalume and Aluminized (Dry or oiled)
- 4) Electro-galvanized steel sheet (oiled)
- 5) Black Plate (Dry or oiled)
- 6) Tinplate and Tin-Free Steel (TFS also known as ECCS- Electrolytic Chromium Coated Steel). Both contain very light coatings of trivalent chromium compounds and metallic chromium but no detectable level of hexavalent chromium.
- 7) Plate Steels

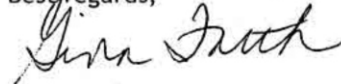
Products which are non-compliant under current standard operating practices with hexavalent chromium requirements are:

- A) Passivated/chem treated hot dipped galvanized/galvannealed, electro-galvanized, and Galvalume steel sheet
 - B) Hot dipped galvanized/galvannealed and Galvalume steel sheet that gets paintable passivation sold for post painting applications
 - C) Painted steel sheet that is toll-painted at coil coaters under single bill that have not been qualified to an alternative pretreat system
 - D) Acrylic coated Galvalume or acrylic coated hot dipped galvanized steel sheets
- These products cannot be used where EU RoHS or ELV directives apply.

We have initiated trials of compliant passivated/chem treated hot dipped galvanized products. We are supplying limited amounts of such compliant product for customer trials.

If you have an interest in discussing this information further please feel free to contact me at 219-787-3277.

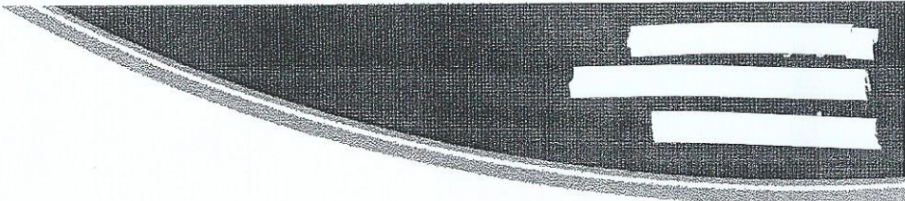
Best regards,



Gina Faith

Division Manager of Central Quality

ArcelorMittal USA T 1-219-787-3277
250 West US Highway 12 F 1-219-787-2911
Burns Harbor, IN 46304-9745



February 2, 2015

Re: Compliance with European RoHS

To whom it may concern:

In July 2006, the European Union (EU) enacted regulations that imposed a Restriction on the use of Hazardous Substances (RoHS) for all electrical and electronic products sold within the EU, including imported products. The original directive specified "a maximum concentration value of 0.1% by weight in homogeneous materials for lead, mercury, hexavalent chromium, polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) and of 0.01% by weight in homogeneous materials for cadmium shall be tolerated". More recently, the EU has issued a Recast Directive 2011/65/EU, known as "RoHS 2". This directive entered into force on July 21, 2011 and requires Member States to transpose the provisions into their respective national laws by January 2, 2013.

The following products are compliant with RoHS 2 regulations:

- 1) Hot rolled steel (dry or oiled)
- 2) Cold rolled steel (dry or oiled)
- 3) Non-passivated or non-chemically-treated hot dipped galvanized, galvanneal steel, or Galvalume steel (dry or oiled)
- 4) All tinmill products, including blackplate, tinplate and tin-free steel (electrolytic chromium coated steel)

Tinplate and tin-free steel both contain very light coatings of trivalent chromium compounds and metallic chromium but no detectable level of hexavalent chromium.

suppliers make no intentional additions of mercury, lead, cadmium, PBB, and PDBE during steelmaking or hot dip galvanizing. However, there are some products which are deemed non-compliant with RoHS regulations due to hexavalent chromium in an applied coating layer/treatment. These are as follows:

- 1) Passivated or chemically-treated hot dipped galvanized, galvanneal steel or Galvalume
- 2) Acrylic coated Galvalume

Many paint systems for coil products contain chromium compounds that could result in the end product containing some level hexavalent chromium and therefore may not be RoHS compliant, Given this fact, RoHS 2 certification for painted products should be sought from your paint suppliers.

Although many of our sheet steel products are RoHS compliant, we ask that you notify us at the time of your order of any RoHS requirements you may have. Our suppliers are constantly making efforts to develop new products or alternative coatings that will be in compliance with RoHS regulations.

Please feel free to contact [redacted] products and compliance under RoHS regulations.

if you have any questions regarding our steel

Sincerely,

The information in this letter is provided for the general information of customers and does not imply any warranty. The interpretation and/or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) [redacted] ation makes no representations or warranties as to any tests used in preparing this letter or the correctness of its contents; (2) [redacted] Corporation 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 letter, 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 on any other basis; (3) you agree to hold [redacted] Corporation harmless against all liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.

CERTIFICATE OF COMPLIANCE

HEAVY METALS

4/25/2017

**PRODUCER:
ADDRESS:**

CUSTOMER:

MATERIAL DESCRIPTION: TIN MILL PRODUCTS

With respect to the new Model in Packaging Legislation now called Toxics in Packaging Clearing House or TPCH (the previous CONEG Legislation), the combined incidental level of lead, mercury, cadmium and hexavalent chromium in our products is less than 100 parts per million.

General Manager
Environmental Affairs

April 6, 2016

To whom it may concern,

_____ hereby confirms to the best of its knowledge that the following residual metals, as determined by chemical analyses of steel products obtained from standard grades produced, may be present in the maximum levels listed as follows:

Pb (lead)	80 ppm	EPA method 6010
Cd (cadmium)	10 ppm	EPA method 6010
Hg (mercury)	0.2 ppm	EPA method 7471
Cr(VI) (hexavalent chromium)	1.25 ppm	EPA method 7196

Packaging and packaging components that use our steel made from standard grades, meet allowable limits for Toxics in Packaging requirements, subject to all applicable exceptions and limitations in such laws and regulations.

In accordance with such regulation, _____ does not intentionally introduce any of the residual metals noted above in the making of our products.

We further confirm that the sum of the aforementioned incidental concentration of lead, mercury, cadmium and hexavalent chromium do not exceed 100 parts per million by weight.

If you have any further questions please contact your Services Representative.

Customer Technical

Sincerely,

Technical Industry Manager
Tin Products

May 12, 2014

RE: Certification of Compliance Food and Drug Administration 21CFR

This is to certify that the Tin Mill steel products as manufactured and shipped by _____ to your company conform to the provisions contained in the following Food and Drug Administration ("FDA") regulations as applicable thereto: (i) 21 CFR 174.5 - General Provisions Applicable to indirect Food Additives; (ii) 21 CFR 175.300 - Resinous and Polymeric Coatings; (iii) 21 CFR 178.3300 -Corrosion Inhibitors Used for Steel or Tin Plate, and (iv) 21 CFR 178.3910 – Surface Lubricants Used in Mfg of Metallic Articles. As such, none of the Tin Mill steel products that we supply you require a warning label under applicable FDA regulations.

This certification does not apply with respect to any conditions as may affect such compliance occurring after shipment by _____ or delivery to your company by reason of causes beyond _____ control.

Sincerely,

Product Technology – Tin Products
Customer Technical Service

