

May 3, 2023

Dear Valued Customer:

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.

Substance- Threshold


1. Lead – 0.1%
2. Mercury – 0.1%
3. Cadmium -0.01%
4. Hexavalent Chromium (Cr6+) – 0.1%
5. Polybrominated Biphenyls (PBB) – 0.1%
6. Polybrominated Diphenyl ethers (DEPH) – 0.1%
7. Bis (2-ethylhexyl) phthalate (DEHP) – 0.1%
8. Butyl Benzyl phthalate (BBP) – 0.1%
9. Dibutyl phthalate (DBP) – 0.1%
10. Diisobutyl phthalate (DIBP) – 0.1%

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 the cadmium is 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 pm). 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.
2. Environmentally persistent transformer fluids / flame retardants are not a part of the manufacturing 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 our manufacturing process.

The letter certifies to the best of our knowledge, our raw material used in the manufacturing of steel tubing complies with the RoHS directive. We have certification statements/declarations from our suppliers of the coil which state that none of the restricted items listed are contained in any of our materials.

Best Regards,



Richard Searing
Executive Vice President of Operations