

Oct 31<sup>st</sup>, 2008

## API DELEVAN: Position on REACH Regulation

To Whom It May Concern:

API Delevan is a manufacturer of *Articles* by definition of the European Union and its Registration, Evaluation, Authorization and Restriction of Chemicals (REACH). With this definition, API Delevan is not required to register within the confines of the REACH Regulation due to our compliance to the following requirements: 1) API Delevan does not import SVHC substances (table below) present in articles in quantities totaling over 1 ton per producer or importer per year; and 2) if a SVHC substance is present it is not intended to be released under normal or reasonably foreseeable conditions of use.

- **Articles** - any object that has been given a specific shape, surface or design which determines its function to a greater degree than does its chemical composition (e.g. manufactured goods such as textiles, electronic chips, furniture, books, toys, kitchen equipment).

To the best of our knowledge our products do not contain any chemicals from the SVHC list > 0.1% by weight. API Delevan will continue to support our customers, distributors and representatives with any information that is required to satisfy the REACH Regulation.

Substance (SVHC)	CAS Number
Anthracene	120-12-7
4,4'- Diaminodiphenylmethane	101-77-9
Dibutyl phthalate	84-74-2
Cyclododecane	294-62-2
Cobalt dichloride	7646-79-9
Diarsenic pentaoxide	1303-28-2
Diarsenic trioxide	1327-53-3
Sodium dichromate, dihydrate	7789-12-0
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7
Hexabromocyclododecane (HBCDD)	25637-99-4
Alkanes, C10-13, chloro (SCCPs - Short Chain Chlorinated Paraffins)	85535-84-8
Bis(tributyltin)oxide	56-35-9
Lead hydrogen arsenate	7784-40-9
Triethyl arsenate	15606-95-8
Benzyl butyl phthalate	85-68-7

Regards,

*Guy W. Steinmetz*

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Quality Manager

API Delevan