



**MARMON AEROSPACE & DEFENSE**  
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March 25, 2021

Dear Valued Customer,

**Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under TSCA Section 6(h)**

As required under the TSCA, as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, the EPA has issued five final rules in December 2020 to reduce exposures to certain chemicals that are persistent, bioaccumulative and toxic (PBT). These chemicals build up in the environment over time and can therefore have potential risks for exposed populations, including the general population, consumers and commercial users, and susceptible subpopulations (such as workers, subsistence fishers, tribes and children). The EPA published a new rule under Section 6 of the TSCA on February 5th, 2021. According to the Act, enforcement of this new rule will begin Monday, March 8, 2021.

In summary, the rule prohibits all manufacture (including import), processing, and distribution in commerce of five PBT chemicals/substances, or products or articles containing the defined PBT chemicals/substances, with some exclusions. The five PBT chemicals/substances named in the new rule and some additional information about the chemicals/substances are as follows:

1. PIP (3:1) [phenol, isopropylated phosphate (3:1); other names: Tris (4-isopropylphenyl) phosphate; CAS: 68937-41-7]; typical uses: phosphorus-containing flame retardant (halogen-free); example trade name: REOFOS 50
2. DecaBDE [Decabromodiphenylether; CAS: 1163-19-5]; typical uses: brominated flame retardant; example trade name: SAYTEX
3. 2,4,6 – TTBP [2,4,6 – tris (tert-butyl) phenol; CAS: 732-26-3]; typical uses: fuel additive
4. PCTP [Pentachlorothiophenol; CAS: 133-49-3]; typical uses: Organic Chlorine Compound
5. HCBD [Hexachlorobutadiene; CAS: 87-68-3]; typical uses: Fungicide & solvent for elastomers

Marmon Aerospace & Defense has verified through review of its suppliers' regulatory datasheets that the materials listed above are not intentionally added in the manufacture of raw materials or at any point during the manufacture of its products.

Sincerely,  
James Filice  
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