

Brumall Manufacturing Environmental Compliance Documentation

RoHS.....	pg 2
REACH.....	pg 3
CA Proposition 65.....	pg 5
TSCA Statement.....	pg 6

January 25, 2024

BRUMALL MFG PRINT, RoHS and REACH CERTIFICATE OF COMPLIANCE

Declaration of Conformity to EU RoHS

Products listed below that are manufactured by Brumall Manufacturing are in compliance with The European RoHS Directive 2015/863/EC, which restricts the following substances in electrical and electronic equipment. In addition, this declaration of conformity is issued under the sole responsibility of Brumall Manufacturing. Brumall Manufacturing does not use any of the Restricted Substances as components in its mechanical wire termination products except in some listed products that include permitted levels of lead (Pb) under the exemption Annex paragraph 6(a)-I,(b)-I,(c).

Lead (Pb) Exemption 6 free machining alloys for only parts listed "9 of 10"

Steel Alloys 0.35% by weight maximum

Copper Alloys 4% by weight maximum

Aluminum alloys 0.4% by weight maximum

Specifically, mechanical wire termination products manufactured do not contain the substances listed below in concentrations greater than the listed maximum value.

Substance	Maximum Limit (ppm)
Lead (Pb)	1000
Cadmium (Cd)	100
Mercury (Hg)	100
Hexavalent Chromium (Cr6+)	1000
Poly Brominated Biphenyls (PBB)	1000
Poly Brominated Diphenyl ethers (PBDE)	1000
Bis(2-Ethylhexyl) phthalate (DEHP)	1000
Benzyl butyl phthalate (BBP)	1000
Dibutyl phthalate (DBP)	1000
Diisobutyl phthalate (DIBP)	1000

Products do not contain Deca Brominated Diphenyl Ether (Deca BDE) legislated under the provisions of the European Commission Decision of 13 October 2005 (2005/717/EC), and do not contain as intentional additives Perfluorooctylsulfonates (PFOS) legislated under the provisions of the European Parliament and Council Directive 2006/122/EC (30th amendment to EU Directive 76/769/EEC).

TSCA Section 6(h)

Products do not contain phenol, isopropylated phosphate(3:1) (PIP (3:1)); decabromodiphenyl ether (DecaBDE); 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP); hexachlorobutadiene (HCBD); or pentachlorothiophenol (PCTP) as legislated under Section 6(h) of the Toxic Chemicals under the Toxic Substances Control Act (TSCA). Brumall Mfg. does not manufacture, process, or distribute these Persistent, Bioaccumulative, and Toxic (PBT) chemicals.

REACH

It is hereby certified that Brumall Manufacturing complies with the Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration Evaluation Authorization and Restriction of Chemicals (REACH) Directives to this extent: Brumall Mfg. is a manufacturer of articles. Brumall Manufacturing has taken the initiative to review itself and its suppliers for the (240) substances that are under consideration for treatment as Substances of Very High Concern (SVHC) candidates.

Brumall Manufacturing has confirmed to the best of its belief, that its products do not contain any of the listed substances in concentration >0.1% weight per supplied article, substance or preparation weight. The exception would be items that include lead. In such items the percent weight of lead is no greater than is allows under RoHS exception Annex paragraph 6(a)-I, (b)-I and (c), Version 4.0 – June 2017.

List of products that are Lead Free “10 of 10” RoHS & REACH compliant:

1/0-SR	2/0TP	350TP	BTP2/0
1000L2	2/0TP-2	600L2	2-800T
1000LL2	250L2	600T-2	3-350L6 (3-350L2/L4)
1000T	250-SR	600T-3	4-12,1,12
1500LL2	250SR-1	600T-4	4-5,1,5
2-1000L2	3-350T	600TP	4-5,1,5-RS
2-1000T	3-600T	800L2	6T
2-250L2	3/0T	800LL2	4-10,1,0
2-350L2	300T-2	800T	4-10,1,10 -RS
2-350TP	300TP	800T-2	4-14,1,14
2-600L2	300TP-2	800T-3	4-7,1,7
2-600TP	350L2	800T-4	4-7,1,7-RS
2-800L2	350T-2	BS350TP	4-9,1,2,8,9-RS
4-22,1,22	4-7,4	4-8,1,8-RS	NEUTRAL YARD
4-5,3	4-3,2	4-8,1,8	C-35
4B-7,1,7	4B-8,1,8	6T-L	GBA20-7
			4-7 NB

List of products that are "9 of 10" RoHS & REACH compliant (permitted limited lead under exemption 6) :

	GLA-4	X-4	GLC-4 DB	
--	-------	-----	----------	--

Please note the steel alloy screws of these parts contain lead in a percentage of .21% by mass.

Certificate of Conformance

BRUMALL MFG further certifies that the parts shipped are made in conformance with materials and processes shown in the Brumall sales catalog drawing provided to the customer at the time of order.

Brumall Mfg. accepts no duty to update this declaration, or to notify users of this declaration of updates or changes to this declaration. Brumall Mfg. shall not be liable for any damages, direct or indirect, consequential or otherwise, suffered by users or third parties as a result of the user's reliance on information in this declaration that has been updated or changed.

For Brumall Mfg.,



Rod Brumberg
President
Brumall Mfg.

California Prop 65 Information

Proposition 65 requires business to provide warnings to Californians about significant exposures to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment. By requiring that this information is provided, Proposition 65 enables Californians to make informed decisions about their exposures to these chemicals.

Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water.

Proposition 65 requires California to publish a list of chemicals known to cause cancer, birth defects or other reproductive harm. This list, which must be updated at least once a year, has grown to include approximately 900 chemicals since it was first published in 1987.

Proposition 65 became law in November 1986, when California voters approved it by a 63-37 percent margin. The official name of the Proposition 65 is the safe Drinking Water and Toxic Enforcement Act of 1986.

Warning Requirements

Businesses are required to provide a clear and reasonable warning on their products before knowingly or intentionally exposing anyone to a listed chemical from the list.

The warning label appearing on a Brumall Manufacturing product does not mean the product causes cancer or reproductive harm. It is merely a notification in adherence to California law advising the consumer of the possibility of a trace amount of a chemical that can cause those health risks. Brumall Manufacturing has chosen to include this warning on our products listed as "Exempted Lead RoHS 9/10" which can expose you to chemicals including lead, which is known to cause cancer, birth defects, or other reproductive harm.

More Proposition 65 Information

For more information regarding Proposition 65 please visit the website below.

www.p65warnings.ca.gov/about/law-regulations

www.brumall.com



7850 DIVISION DRIVE, MENTOR, OHIO 44060

*** By signing this document, you are representing that you are authorized to make claims on behalf of your company regarding TSCA and that such claims can be relied upon ***

TSCA RESTRICTED SUBSTANCES DECLARATION

The United States Toxic Substances Control Act (TSCA) is a federal chemicals management regulation. Under TSCA Section 6, certain substances and substance families (including treated articles containing these substances) are restricted from distribution in U.S. commerce, including:

- Asbestos
- Lead, when used in paint
- Polychlorinated biphenyls (PCBs)
- Dioxins
- Chlorofluorocarbons (CFCs, ozone depleting substances)
- Metallic mercury, when used in consumer products
- Formaldehyde, when used in composite wood products
- Nitrites, when used in certain cutting fluids
- Hexavalent chromium compounds, when used in water treatment
 - Five Persistent, Bioaccumulative, and Toxic substances restricted in 2021:
 - PIP 3:1 (CAS 68937-41-7)
 - DecaBDE (CAS 1163-19-5)
 - 2,4,6 TTBP (CAS 732-26-3)
 - HCBd (CAS 87-68-3)
 - PCTP (CAS 133-49-3)

To whom it may concern,

We hereby send you information related to substances restricted under TSCA. This communication applies to all products sold or otherwise placed on the market by [Brumall Manufacturing Corp] prior to the signature date of this declaration.

OR, We hereby send you information related to substances restricted under TSCA. This communication applies to all products sold or otherwise provided to [Advancement International] prior to the signature date of this declaration.

[For the purposes of this declaration, substances restricted only in certain product types or situations need NOT be reported in other product types or situations. For instance, formaldehyde is only restricted in composite wood products; otherwise it does not need to be reported. However, substances restricted without reference to specific product types or use situations must always be reported.]

If no products contain any of the restricted substances, this option must be selected:

Checking this box certifies that none of the products referenced above contain any substances currently restricted under TSCA.

OR, if any products contain any restricted substances, this table must be completed. Each product listed contains one or more restricted substances, either without exemption or with the listed applicable exemption(s).

Product(s)	Substance Name or CAS Number	Concentration (%)	Exemption

Name: ROD BRUMBERG

Signed: R. Brumberg

Title: PRESIDENT

Date: 12/6/2023

Email: MAIL@BRUMALL.COM

Phone: 440-974-2822