

Polypropylene

All Polypropylene Products

Effective Date: January 12, 2014

Statement of Compliance with Heavy Metals Regulations

Total Petrochemicals & Refining USA, Inc. manufactures **polypropylene** products as uncolored pellets, which are not formulated to contain (i.e., not intentionally added) the following metals or compounds of these metals: antimony[†], arsenic[†], beryllium, bismuth, boron, cadmium, chromium including hexavalent chromium, cobalt, copper, gold, iridium, lead, manganese, mercury, molybdenum, nickel, osmium, palladium, platinum, rhodium, ruthenium, selenium[†], silver, tantalum, tellurium, thallium, tin, tungsten or vanadium.

The sum of the incidental concentration levels of **lead, mercury, cadmium and hexavalent chromium** present does not exceed 100 parts per million (ppm) by weight.

Acid extractable and TCLP (Toxicity Characteristic Leaching Procedure) testing was performed on samples of our polypropylene products. The metals analyzed included antimony, arsenic, barium, cadmium, chromium, lead, mercury, and selenium. All of the metals were found to be in concentrations less than the detection limit, specifically, **less than 100 parts per billion** (ppb).

Based on formulation and analysis, when used as a packaging component these products comply with the elemental content restrictions required by:

- Coalition of Northeastern Governors (CONEG) model Toxics in Packaging Legislation;
- State of California Toxics in Packaging Prevention Act [California Health and Safety Code, division 20, chapter 6.5, article 10.4 (beginning with §25214.11).
- ASTM Standard Consumer Safety Specification on Toy Safety, ASTM F 963, 4.3.3 and 4.3.5;
- European Directive 94/62/EC, Article 11, addressing toxics in packaging, and as amended by 2004/12/EC;
- European Directive 2000/53/EC, Article 4, 2 (a), addressing metals in materials and components of vehicles; as amended by 2002/525/EC.
- European Directive 88/378/EEC (and amendments) including CEN EN 71, which technically addresses the fabricated article (toy), not the polypropylene product.

This statement does not cover the users:

- modification of our product by any addition of any other product to it.
- modification of the product resulting from processing of the product.
- inadequate use and / or storage of the material and of the finished article.



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Manager Product Stewardship
Total Petrochemicals & Refining USA, Inc.

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[†] Technically, antimony and arsenic are metalloids and selenium is a non-metal.

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