



2355 Bond Street • University Park, IL 60466 • 708.534.6800 • 708.534.6826 fax

February 21, 2024

Subject: Consumer Products Safety Improvement Act of 2008
(Lead and Phthalates)

To Whom It May Concern:

The Consumer Products Safety Improvement Act (CPSIA) is a U.S. regulation that addresses, among other things, the presence of lead and phthalates in children's toys. The CPSIA threshold for the presence of lead in toys is 100 ppm (0.01%). Phthalates (chemical plasticizers) cannot be present at more than 1000 ppm (0.1%) per phthalate.

LEAD

Lead is inherent in steel as a residual material. Arbon Steel and Service, Co., Inc. ("Arbon") does not purposefully add lead to the steel.

Arbon is capable of supplying steel at or below the levels required in the CPSIA. The requirements for compliance must be explicitly stated on the purchase order so the appropriate evaluation limits can be applied. If required, test data must be requested and is not normally supplied.

PHTHALATES

The six phthalates include in this law are diisononyl phthalate (DINP), diisodecyl phthalate (DIDP), di-n-octyl phthalate (DnOP), bis(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), and benzyl butyl phthalate (BBP). Phthalates are not added to the steel nor are they a part of the steel manufacturing process.

Should you have any questions or require further information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald J. Hardy', is written over a printed name.

Donald J. Hardy

President

The information in this letter is provided by Arbon Steel and Service Co., Inc. for itself and, for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) Arbon makes no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) Arbon shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or any other basis; and, (3) you agree to hold Arbon harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.



February 2, 2024

Re: The Consumer Product Safety Improvement Act (CPSIA) of 2008

To whom it may concern:

Companies manufacturing or importing certain consumer products in the United States must comply with The Consumer Product Safety Improvement Act (CPSIA) of 2008. CPSIA imposes testing and documentation requirements, and sets acceptable levels of several substances.

Steel supplied by Titan Steel is not sold as a consumer product and is not considered to be a consumer product under CPSIA. Our steel products may contain trace quantities (generally much less than 0.1%) of certain chemicals such as nickel, arsenic, and lead.

The chemicals contained in Titan Steel's products are not intentionally added or included. Due to the steel making process, these chemicals can be present in trace amounts in all steel products from all steel producers. Variations in the steel making process may increase or decrease the levels of these chemicals, but steel products supplied by Titan Steel contain levels of these chemicals that fall within industry standards.

Titan Steel has no control over, or knowledge of, our steel products once they leave our facilities. Any changes by another party to the form or end use of the steel may alter its status under CPSIA. It remains the responsibility of any party that uses or sells our steel products to determine its requirements under CPSIA.

For specific orders, additional toxicology information may be available from Titan Steel. Please feel free to contact me at max@titansteel.com or 443-451-7759 if you have any questions regarding our steel products and compliance under CPSIA regulations.

Sincerely,

A handwritten signature in black ink that reads "Max Levin".

Max Levin
Chief Executive Officer
Titan Steel Corporation