

April 2024

MWS Wire Industries' TSCA Statement

On June 22, 2016, the Frank R. Lautenberg Chemical Safety for the 21st Century Act (Lautenberg Chemical Safety Act) was signed into law. The Lautenberg Chemical Safety Act amends the Toxic Substances Control Act (TSCA). In accordance with TSCA, January 6th 2021 the U.S. Environmental Protection Agency (EPA) outright banned the following five persistent, bioaccumulative, and toxic (PBT) substances:

- 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)

This documentation serves as notice MWS is aware of the EPA's 2021 action. After a review of our available SDS and supplier documentation I am unaware of any of these chemicals in our supply chain and do not envision this action will affect the materials MWS is supplying our customers. Further the additional restricted substances listed in TSCA Section 6 are not expected to be contained in wire products or are restricted only in certain non-wire applications.

Currently, the EPA is evaluating n-methylpyrrolidone (NMP) for potential unreasonable health risks from exposure to this chemical. NMP is a liquid solvent commonly used in the coating production of magnet wire including Polyimide (MW16), Polyamideimide (MW81), and Polyester A/I (MW35). Third party testing of finished magnet wire has demonstrated residual NMP less than 0.1% and in many cases is not detectible. While the EPA has not created a final rule, the electronics manufacturing industry envisions a provision will be made to allow for permissible trace levels in finished wire products.

The EPA is mandated by TSCA to evaluate the risks associated with exposure to existing chemicals resulting in a growing list for restrictions of chemical substances. MWS will continue to monitor ongoing TSCA developments as it pertains to wire products.

Sincerely,



Ryan Mayfield, Facility Manger

This document does not constitute and is not intended as regulatory or legal advice. It may not be relied on solely to determine compliance status with TSCA. The regulation and guidance on requirements and applicability for various operators in the supply chain are available on the EPA website <https://www.epa.gov/laws-regulations/summary-toxic-substances-control-act> which should be consulted when making specific compliance determinations.

