

November 25, 2024

Ms. Kelly Murphy
Nexeo Plastics
kamurphy@nexeoplastics.com

Dear Kelly:

At your request, this letter provides updated EU REACH SVHC and TSCA 6(h) PBT regulatory information for the following product:

Nexeo Plastics (Customer ID # 4510001569, 55210 prev.)			
Nexeo P/N	AG P/N	Prev. AG P/N	Product
94908	5020005380	956218	ALPHAMED 2222C-90 Clear 0003

REACH SVHC

REACH (**REGULATION (EC) No 1907/2006**) Article 56 requires any substance identified in Annex XIV to have Authorization by the European Chemicals Agency, to be used in the EU beyond its designated sunset date. The current authorization list contains 59 substances, with 54 of those beyond their sunset dates. Article 57 sets forth the requirements for the candidate list of substances subject to authorization in Annex XIV. These candidates are known as **Substances of Very High Concern** (SVHC) and as of 11/7/24 with the addition of triphenyl phosphate (TPP, CAS # 115-86-6), they number 242 substances. The threshold for declaration is 0.1% (1000-ppm). Accordingly, the following SVHC is declared for this product:

Bis(2-ethylhexyl)phthalate, CAS # 117-81-7, EC # 204-211-0, 17.0% by weight

On SVHC list for the following:

Toxic for reproduction (Article 57(c))

Endocrine disrupting properties (Article 57(f) – environment)

Endocrine disrupting properties (Article 57(f) – human health)

On authorization list (sunset date 2/21/15)

No other SVHCs are declarable for this product.

TSCA 6(h) Rules on PBTs

The US Environmental Protection Agency (EPA) issued rules under Section 6(h) of TSCA to reduce exposure to selected Persistent Bio-accumulative Toxins (PBTs). The goal is to protect the general population, consumers, commercial users and certain subpopulations from exposure to these substances. Five restricted PBTs were included and are identified as follows:

- 1) Decabromodiphenyl ether (DecaBDE), CAS # 1163-19-5
- 2) Phenol, isopropylated phosphate (3:1), otherwise known as PIP (3:1), CAS # 68937-41-7
- 3) 2,4,6-Tri(t-butyl) phenol (2,4,6-TTBP), CAS # 732-26-3

- 4) Hexachlorobutadiene (HCBD), CAS # 87-68-3
- 5) Pentachlorothiophenol (PCTP), CAS # 133-49-3

Alphagary does not use any of these substances, or intentionally add them to ALPHAMED 2222C-90 Clear 0003. Furthermore, these substances are not known to be present in the raw materials we use to manufacture it. Therefore, our product complies with the PBT rules set forth by the EPA.

Sincerely,



Troy E. Brantley
Manager of Regulatory Compliance

Cc: Mr. Marco Interlandi | Orbia (Alphagary)
Ms. Joyce Jones | Orbia (Alphagary)