



**EPA’s Restrictions for the Substances: PIP (3:1); decaBDE; HCBd; PCTP; and 2,4,6-TTBP**

Dear Century Spring Corp. Customer,

On January 6, 2021, EPA issued 5 regulations related to substances relevant to Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under TSCA Section 6(h).

**Table 1 – Summary of the 5 Restrictions**

substance	PIP / PIP (3:1)	DBDE / DecaBDE	HCBd	PCTP	TTBP / 2,4,6-TTBP
	phenol, isopropylated phosphate (3:1)	Decabromo diphenyl ether	Hexachloro butadiene	Pentachloro thiophenol	2,4,6-tris (tert-butyl) phenol
CAS	68937-41-7	1163-19-5	87-68-3	133-49-3	732-26-3
Action threshold	Any amount is prohibited			c > 1%	c > 0.3%
Use info	Among other uses, present as flame retardant and/or plasticizing agent in polyvinylchloride (PVC) plastics, polyurethanes, BPA epoxies, and some lubricants.	Among other uses, might be present as a flame retardant in heat shrink and nylon connectors. Also restricted by the EU RoHS Directive as a polybrominated diphenylether (PBDE) to a more relaxed 0.1% threshold, and by EU POPs to ~0.05% (as the sum of tetra-, penta-, hexa-, hepta- and decaBDE)	Not likely to be present. It is usually an intermediate in the production of other substances, but might remain as a residue. Banned by EU POPs regulation.	Among other uses, might be present in butadiene or isoprene rubbers.	Present in some types of oils that might be used to lubricate components.
Restricted from	2021 Mar 8 (Dst. & Prc.)  Non-enforced until ~Sep 10 <sup>th</sup> .	2021 Mar 8 (Mnf. & Imp. & Prc.)  2022 Jan 6 (Dst.)	2021 Mar 8 (Mnf. & Imp. & Prc. & Dst.)	2021 Mar 8 (Mnf. & Imp. & Prc.)  2022 Jan 6 (Dst.)	2026 Jan 6 (Prc. & Dst.)
Mnf. = Manufacturing Imp. = Importing Prc. = Processing Dst. = Distributing in US Commerce					

The EPA has assigned no threshold (nor ‘de minimis’ threshold) to the PIP, DBDE or HCBd restrictions. Therefore, any amount is an actionable amount. Although 0.1% is a common threshold in other regulations, it does **not** apply to these restrictions. Any amount of these substances in any part or service supplied is of interest to you. Also, the regulations make no distinction between intentional and unintentional presence of these substances– even if the substance is present unintentionally, it is restricted.



Company: Century Spring Corp.

Company Address: 5959 Triumph St, Commerce, Ca 90040

This declaration of conformity is issued under the sole responsibility of Company, who hereby declare that the products and services supplied to Century Spring Corp. **Do not** contain any of the 5 chemicals listed in **Table 1** from 5 regulations related to substances relevant to Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under TSCA Section 6(h): PIP (3:1); decaBDE; HCBd; PCTP; and 2,4,6-TTBP.

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Date: 10/14/2024

Signature: *Juan Rodriguez*