



## *Electronic Fasteners, Inc.*

*"Experts in Fasteners - Excellence in Service"*

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May 26, 2021

### **Declaration of Conformity Toxic Substance Control act (TSCA)**

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures for manufacturing or importing. TSCA addresses the production, importation, use, and disposal of specific chemicals. The TSCA does not apply to finished goods or parts.

Various sections of TSCA provide authority to:

- Require, under Section 5, pre-manufacture notification for "new chemical substances" before manufacture.
- Require, under Section 4, testing of chemicals by manufacturers, importers, and processors where risks or exposures of concern are found.
- Issue Significant New Use Rules (SNURs), under Section 5, when it identifies a "significant new use" that could result in exposures to, or releases of, a substance of concern.
- Under Section 6(h) compliance, EFI products comply with the PIP (3:1) (phenol, isopropylated = (3:1), CAS 68937-41-7 requirements. There is also no release during manufacturing, processing, or distribution.
- Maintain the TSCA Inventory, under Section 8, which contains more than 83,000 chemicals. As new chemicals are commercially manufactured or imported, they are placed on the list.
- Require those importing or exporting chemicals, under Sections 12(b) and 13, to comply with certification reporting and/or other requirements.
- Require, under Section 8, reporting and record-keeping by persons who manufacture, import, process, and/or distribute chemical substances in commerce.
- Require, under Section 8(e), that any person who manufactures (including imports), processes, or distributes in commerce a chemical substance or mixture and who obtains information which reasonably supports the conclusion that such substance or mixture presents a substantial risk of injury to health or the environment to immediately inform EPA, except where EPA has been adequately informed of such information. EPA screens all TSCA b§8(e) submissions as well as voluntary "For Your Information" (FYI) submissions. The latter

are not required by law but are submitted by industry and public interest groups for a variety of reasons.

The Toxic Substance Control Act (TSCA) does not apply to the parts in which Electronic Fasteners, Inc. sells.

Electronic Fasteners, Inc. assures customers that everything reasonably possible is being performed to maintain compliance with all environmental standards. Controls are in place to help assure that our products remain compliant. We will continue to communicate with our suppliers and maintain compliance records for all our products as part of our compliance program.

Should you have any questions or concerns regarding this statement, please do not hesitate to contact us. Email [compliance@bluecircleadvisors.com](mailto:compliance@bluecircleadvisors.com) for any further information.



Del Furbish  
Sales & Marketing Manager

*ISO 9001 Certified*

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