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Declaration of conformity - TSCA

We hereby certify that products manufactured by **Gremarco, LLC** are fully compliant with the requirements of the Toxic Substances Control Act (TSCA), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act. On **January 6, 2021**, EPA issued five final rules to reduce exposures to certain chemicals that are persistent, bioaccumulative and toxic (PBT).

EPA identified these five PBT chemicals for expedited action, following criteria outlined in TSCA. The final rules limit or prohibit the manufacture (including import), processing, and/or distribution in commerce of the following:

- Decabromodiphenyl ether (decaBDE) [1163-19-5]: a flame retardant in plastic enclosures for televisions, computers, audio and video equipment, textiles and upholstered articles, wire and cables for communication and electronic equipment, and other applications
- Phenol, isopropylated phosphate (3:1) (PIP (3:1)) [68937-41-7]: a plasticizer, flame retardant, anti-wear additive, or anti-compressibility additive in hydraulic fluid, lubricating oils, lubricants and greases, various industrial coatings, adhesives, sealants, and plastic articles
- 2,4,6-tris(tert-butyl) phenol [732-26-3]: an intermediate/reactant in processing, incorporated into formulations destined for fuel and fuel-related additives
- Hexachlorobutadiene [87-68-3]: a halogenated aliphatic hydrocarbon produced as a byproduct during the manufacture of chlorinated hydrocarbons
- Pentachlorothiophenol [133-49-3]: a chemical used to make rubber more pliable in industrial uses

On November 19, 2024, EPA published a final rule revising the regulations for decaBDE and PIP (3:1), effective **January 21, 2025**. Among other changes, the revisions establish a 0.1% by weight de minimis threshold for unintentionally added decaBDE and PIP (3:1) in products and articles, and prohibit distribution in commerce of PIP (3:1)-containing articles after October 31, 2026, subject to specified exclusions. Gremarco, LLC products remain compliant with these requirements.

Gremarco, LLC is also aware of the PFAS reporting and recordkeeping requirements under TSCA Section 8(a)(7), for which the data submission period is currently scheduled to begin January 31, 2027, and will comply with any applicable reporting obligations.

Authorised Name: **Paul Beardsley**

Date: **June 12, 2026**

Signature:

A handwritten signature in black ink that reads "Paul Beardsley". The signature is written in a cursive style with a long, sweeping underline.