



26 April 2023

## TOXIC SUBSTANCES CONTROL ACT (TSCA)

Dear Valued Customer,

On January 6<sup>th</sup>, 2021, the U.S. Environmental Protection Agency (EPA) published a final rule prohibiting the processing and distribution into commerce of Phenol, Isopropylated Phosphate (3:1) (PIP 3:1) under Section 6(h) of the Toxic Chemicals under the Toxic Substances Control Act (TSCA) as a persistent, bioaccumulative toxin (PBT) along with four other PBT's. The final rule has gone into effect on March 8<sup>th</sup>, 2021. PIP (3:1) is a chemical substance that is used as a plasticizer, a flame retardant, an anti-wear additive, or an anti-compressibility additive in hydraulic fluid, lubricating oils, lubricants and greases, various industrial coating, adhesives, sealants and plastic articles.

This regulation has two important requirements. First, it bans the distribution of products containing PIP (3:1) immediately within the U.S. Second, EPA is requiring that persons manufacturing, processing, and distributing PIP (3:1), and products containing PIP (3:1) into commerce, notify their customers of these restrictions starting March 8<sup>th</sup> 2021.

Kirk Key Interlock Company does not contain any of the PBT's listed below within their products.

### PBT's

- Decabromodiphenyl Ether (DecaBDE)
- Phenol, Isopropylated Phosphate (3:1) (PIP (3:1))
- 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP)
- Hexachlorobutadiene (HCBD)
- Pentachlorothiophenol (PCTP)

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