



**Department Correspondence  
Environment, Health & Safety**

**Date: December 1, 2008**

**Subject: European Union Regulation (EC) 1907/2006  
Substances of Very High Concern (SVHC)**

**To: Memo to EHSMS File  
Record of Decision**

**Background**

As of June 2007, the European Union Regulation (EC) 1907/2006, the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), entered into force. One of the key requirements of REACH is that EU substance manufacturers and importers have a duty to inform customers of the presence of Substances of Very High Concern (SVHC) in preparations and articles over a threshold of 0.1% by weight. In response to this requirement our customers have requested from Republic, product data on the 16 SVHCs on the initial candidate list (shown below) and how much, if any, is contained in any of our products.

<b>Substance Name</b>	<b>CAS Number</b>	<b>EC Number</b>
Anthracene	120-12-7	204-371-3
4,4'- Diaminodiphenylmethane	101-77-9	202-974-6
Dibutyl phthalate	84-74-2	201-557-6
Cyclododecane	294-62-2	206-33-9
Cobalt dichloride	7646-79-9	231-589-4
Diarsenic pentaoxide	1303-28-2	215-116-9
Diarsenic trioxide	1327-53-3	215-481-4
Sodium dichromate, dihydrate	7789-12-0	-
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2	201-329-6
Bis (2-ethyl(hexyl)phthalate) (DEHP)	117-81-7	204-211-2
Hexabromocyclododecane (HBCDD)	25637-99-4	247-148-6
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8	287-476-7
Bis(tributyltin)oxide	56-35-9	200-268-2
Lead hydrogen arsenate	7784-40-9	232-064-4
Triethyl arsenate	15606-95-8	427-700-4
Benzyl butyl phthalate	85-68-7	201-622-9

In order to respond to our customers requests relative to their REACH obligations, Republic undertook the following two reviews:

1. We reviewed our steelmaking raw materials, alloys and additives against the REACH SVHC list; and
2. We queried our suppliers who provide us with coolants, rust inhibitors, coating oils and other materials that we may apply to our products at customer specification, asking that they evaluate these materials for the above SVHCs and report whether any of their products supplied to Republic contained any of these substances and, if so, at what concentration by weight.

### **Results**

Republic did not find any of the listed 16 SVHC materials being added/used as ingredients in any of the wide variety of products we formulate and supply to our customer base. The organics listed, even if somehow inadvertently present in the raw material mix, would not survive the extremely high temperatures used to melt and refine our products. Although Republic does add metals such as lead and chromium to our steels to give them their customer specific alloy properties; they are added as the metallic form of the element, not as an inorganic salt such as sodium dichromate, dihydrate.

Based on the responses of our applied material product suppliers, Republic can further report that none of the 16 SVHC substances were found in any of the applied materials supplied to Republic.

Finally, Republic's steel products do not intentionally release any substances during use. This document serves as our record of decision for this topic.



Leonard D. Wisniewski, Director  
Environment, Health & Safety Department &  
EHSMS Management Representative