

ENVIRONMENTAL POLICY STATEMENT

In 2006, Republic Engineered Product, Inc. (Republic) committed to participating in the National Vehicle Mercury Switch Removal Program ("NVMSRP") as the most effective means of reducing the number of mercury-containing switches in the vehicle scrap stream, and thereby minimizing potential emissions of mercury to the environment. As part of this commitment, Republic has contributed to the NVMSRP Implementation Fund and will ensure that its steel making facilities that melt scrap maintain a program with the goal of minimizing the presence of mercury-containing switches in the scrap feedstock.

Republic's program includes:

- (A) Posting this policy on our internet site to notify others of our participation in the program;
- (B) Within the framework of our ISO 14001 certified Environmental Management System, modifying an existing Scrap Management Program at our Canton Plant and implementing new Scrap Management Program at our Lorain Plant to incorporate the NVMSRP provisions.
- (C) Requesting documentation from suppliers of vehicle scrap regarding their participation in the NVMSRP or implementation of a similar mercury switch removal program;
- (D) Requesting and strongly encouraging direct scrap suppliers to communicate these requirements to each upstream supplier, dismantler, vehicle crusher, shredder, and scrap processing facility;
- (E) Participating, through the Steel Manufacturers Association (SMA), in USEPA's potential air regulations as a compliance option to promote the reduction of mercury switches in auto shred thereby minimizing mercury as an air contaminant in our iron & steel making emissions;
- (F) Monitoring the ELVS database to ensure scrap suppliers are participating as anticipated in the NVMSRP and verifying scrap supplier compliance with mercury switch removal requirements, including scrap supplier site visits, spot checks of scrap loads, and/or requests for documentation as often as is deemed necessary to protect the integrity of the incoming scrap feedstock;
- (G) Cooperating as appropriate with ELVS personnel in the development of education training materials and outreach programs; and
- (H) Cooperating as appropriate with ISRI to assure that any scrap work practice standards or other programs that may be implemented in accordance with this program take into account market and technological factors and do not create any unreasonable certification requirements for scrap processors.



Jaime V. [unclear]
President & Chief Executive Officer