

April 18, 2022

Subject: U.S. EPA Persistent, Bioaccumulative, and Toxic (PBT) Rule issued pursuant to TSCA Section 6(h)

To Whom It May Concern:

In January 2021, the U.S. Environmental Protection Agency (USEPA) published a final rule regulating/prohibiting the following PBT chemicals pursuant to the Toxic Substances Control Act's (TSCA) Section 6(h).

1. Phenol, isopropylated phosphate (PIP 3:1)
2. Decabromodiphenylether (DecaBDE)
3. 2,4,6-Tris(tert-butyl) phenol (2,4,6-TTBP)
4. Hexachlorobutadiene (HCBd)
5. Pentachlorothiophenol (PCTP)

Since the January 21 rule publication date, numerous issues, particularly with respect to PIP 3:1 chemicals, arose under the final rule. In March 2022, EPA issued an updated rule extending the compliance date to October 2024 for the PIP 3:1 prohibitions and recordkeeping requirements. See <https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/current-and-future-actions-pbt-rules>. In addition, USEPA has indicated that it plans to issue new rules for the five referenced chemicals in 2023.

Please be advised that Cleveland-Cliffs Steel LLC and Cleveland-Cliffs Steel Corporation (collectively, "Cleveland-Cliffs Steel") steel products do not contain any of the five PBT chemicals identified in the U.S. EPA's January 2021 PBT rule.

We continue to monitor for new developments or updates to TSCA and USEPA chemical requirements and perform an annual review for any changes that may apply to Cleveland-Cliffs steel products.

Safety data sheets for Cleveland-Cliffs steel products can be found at:  
<https://www.clevelandcliffs.com/doing-business/product-compliance>.

Thank you for your inquiry.

Sincerely,

A handwritten signature in cursive script that reads "Evelyn Hoffman".

---

Evelyn Hoffman  
Director, Central Quality  
Cleveland-Cliffs Steel

The information in this letter is provided for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) Cleveland-Cliffs Steel makes no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) Cleveland-Cliffs Steel shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or on any other basis; and, (3) you agree to hold Cleveland-Cliffs Steel harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.