

# SMALL TUBE PRODUCTS



*"Skilled producers of  
copper and brass tubing"*

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November 5, 2018

To: Small Tube Products' Customers  
Subject: Compliance with California Proposition 65 Requirements

This letter is intended to communicate Small Tube Products' position with California's Proposition 65 requirements and identify actions being taken by Small Tube Products to communicate any necessary warnings to our customers. Small Tube Products participates in a business-to-business sales relationship with its customers and, as such, our products are typically used to fabricate end components that are sold by our customers to other businesses or the general public. Because of this, Small Tube Products has chosen to provide off-product warnings. After reviewing the Proposition 65 chemical list, there are two known elements present in some of our tubular products:

1. Lead - according to Prop 65, the NSRL level for carcinogens is 15 micrograms/day (oral) while the MADL level for chemicals causing reproductive toxicity is 0.5 micrograms/day. While we maintain no known quantitative method to establish whether a person will be exposed to those levels through oral means or inhalation, we are providing the warning for the following alloys:

C22000	C23000	C24000	C26000	C27000
C27400	C33000	C33200	C43500	C44300

2. Soluble Nickel Compounds - any product containing metallic nickel or nickel compounds is subject to reporting effective October 26, 2018. CA Prop 65 considers metallic nickel as "reasonably anticipated to be a carcinogen," but no safe harbor dose levels for nickel have been established. The following alloys are impacted:

C70600	C70620	C71500	C71520
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Small Tube Products is providing clear and reasonable notice as follows:

1. We will complete any Prop 65 questionnaires that are sent to us by our customers.
2. When a customer places an order for one of the above alloys, STP's order acknowledgement will include a Prop 65 Warning.
3. When an order for the above alloys is prepared for shipment, the packing list will include a Prop 65 Warning.

If you have no concerns or questions, STP will consider no response as an implied acknowledgement of receipt of our notice. If there are any additional questions, please feel free to contact us.

James J. Barroner  
Quality Manager