



The Specialist in Electronic Component Distribution

**RE: Toxic Substances Control Act (TSCA)**

Dear Customer,

The U.S. Environmental Protection Agency (EPA) posted in the Federal Register notice of the Agency's intent to restrict the use of Phenol, isopropylated phosphate (3:1) (PIP (3:1) (CAS: 68937-41-7) and four other chemicals. These final rules were effective February 5, 2021.

PIP(3:1) is mostly used in lubricants and greases, coating products, adhesives and sealants, polymers, photo-chemicals and hydraulic fluids, but also as a plasticizer and flame retardant in plastic. The EU's REACH regulation includes this along with other registered substances, but has not identified it as one of the SVHC. California Proposition 65 also does not include this chemical.

While these rules provide exemptions, most generally do not apply to the electronic component industry, however, the third exemption most closely relates:

- Processing and distribution in commerce for use in new and replacement parts for the automotive and aerospace industry, and the distribution in commerce of those parts to which PIP (3:1) has been added;

TTI has engaged the Electronic Component Industry Association (ECIA) to work with component manufacturers on the industry's response. TTI will keep abreast of developments, and post information as it becomes available in this regard. At this time, TTI has no information on PIP3:1 in the products we distribute.

Importantly, on March 8, 2021, the EPA issued a temporary 180-day 'No Action Assurance' order and extended the public comment period to seek industry input on newly-raised issues associated with the March 8, 2021, compliance date for the prohibitions on processing and distribution of Phenol, Isopropylated Phosphate (3:1) (PIP (3:1)) for use in articles, and the articles to which PIP (3:1) has been added.

Recently, in a final rule effective September 17, 2021, the EPA delayed enforcing compliance with the ban on distributing PIP (3:1) in articles, and the associated recordkeeping requirement, until March 8, 2022.

As mentioned above, the EPA also included 4 other chemicals in recent actions. DecaBDE (CAS: 1163-19-5) is a Polybrominated diphenyl ether, therefore it is covered under the RoHS directive. Hexachlorobutadiene (HCBd) (CAS: 87-68-3) is used as a chlorine scrubber in manufacturing processes such as the production of HCl gas. 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP) (CAS: 732-26-3) is used as stabilizer, free-radical scavenger and antioxidants in technical applications, such as in fuels, hydraulic fluids and lubricating oils. Pentachlorothiophenol (PCTP)(CAS: 133-49-3) was used in the rubber industry. The compound was added to rubber (both natural and synthetic) to facilitate processing. However, the EPA received a letter in 2017 from the Rubber Manufacturers Association, indicating that its members "do not currently use ... PCTP to manufacture tires produced in the U.S. or imported into the U.S." Therefore, these additional chemicals are addressed by RoHS, or have no application to electronics.

For further information, see also ECIA's website . . . <https://www.ecianow.org/pip--3-1->

Regards,

John Archer