



January 21, 2009

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Office of the Vice President/Chief Technical Officer

Mr. Jock Farra
PVC Spiral Supply
123 East 45th Street
Boise, Idaho 83714

Email: jsfarra@pvcspiralsupply.com

Subject: Consumer Product Safety Improvement Act of 2008 (CPSIA)

Dear Mr. Farra:

As requested, Breen Color certifies that products sold to PVC Spiral Supply conform to the requirements of CPSAI, Title 1, Section 101 (lead) and Section 108 (phthalates). Conforming products are listed in Table A. Table B lists products that are non-conforming. Breen is creating conforming compositions for the products in Table B and will provide certification for those when they are completed.

Section 101 Lead: The products noted in Table A do not intentionally contain lead or lead compounds. Trace levels of lead may be present as contaminants in the raw materials. Any detected presence of lead in our products, as supplied, will be below 25 parts per million. This is below the 100 ppm ultimate threshold level specified in Section 101. Additionally, any presence of lead in your products will be very small because our products comprise only a small percentage of the weight of your products.

Section 108 Phthalates: The products listed in Table A do not intentionally contain phthalate plasticizers cited in Section 108. These are di-(2-ethylhexyl) phthalate (DEHP), di-butyl phthalate (DBP), butyl benzyl phthalate (BBP), di-isononyl phthalate (DINP), di-isodecyl phthalate (DIDP) and di-n-octyl phthalate (DnOP). Trace levels of these substances may be present as contaminants in the raw materials. Any detected levels of these phthalate plasticizers in our products, as supplied, will be far below the 0.1% (1000 ppm) threshold specified in Section 108. Detected levels, if any, of phthalate plasticizer in the products you make will be far below this threshold value because the color concentrate represents a small portion of your product.

Please contact me or Carol Critelli if you have questions or need further information.

Sincerely,

Paul Legnetti

Paul Legnetti
VP & CTO

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Table A. Breen Products That Conform, As Supplied, To CSPIA-2008 Title 1, Section 101 and Section 108
(Less than 100 ppm lead, less than 0.1% listed phthalate plasticizers)

Black 318	Blue 5112	Blue 5115	Blue 253
Blue 254	Blue 525	Blue 536	Brown 379
Gray 5037	Green 5051	Green 251	Green 5052
Green 349	Green 5047	Green 5030	Orange 162
Orange 353	Purple 153	Purple 345	Purple 351
Red 525	Red 526	Red 527	Tan 282
White 351	White 352	White 331	Yellow 393
Yellow 190	Yellow 227	Yellow 391	Yellow 392

Table B. Breen Products That Do Not Conform, As Supplied To CPSIA-2008, Sections 101 and 108

Brown 116	Green 112	Red 106	
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