

GIBBS INTERWIRE

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1/3/2022

To: Valued Customer
From: Gibbs Wire & Steel, LLC
Re: California Proposition 65 – Revised Listing as of December 2021

To the best of our knowledge the materials we supply do not contain any of the listed CA Prop 65 substances in a form that would require labeling per the updated regulation guidelines and listings effective 12/31/2021.

Nickel (Metallic) and Nickel compounds are on the Prop 65 Substance List, which was last updated on 6/28/2019. However, Nickel contained in alloy form (which Gibbs stocks under 300 series, some 200 series and Inconel alloys) are shown as being *distinct* and thus exempted from Prop 65 (see below).

“SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986
(Proposition 65)
NOTICE TO INTERESTED PARTIES May 7, 2004
CHEMICAL LISTED EFFECTIVE May 7, 2004 AS KNOWN TO THE STATE OF
CALIFORNIA TO CAUSE CANCER

For the purposes of clarification, OEHHA notes that nickel alloys are distinct from nickel compounds, and are not included in the Proposition 65 listing of *nickel compounds*.”

In addition, Nickel coatings which we view as covered by Nickel and Nickel compounds are covered by the following statement:

“As indicated in Title 22 of the California Code of Regulations Section 12707(b)(5), for purposes of Proposition 65, nickel and nickel compounds present no significant risk of cancer by the route of ingestion.”

Another substance that can be found on the Prop 65 list which might lead to some questions is “Cobalt Metal Powder”. However, as mentioned above with Nickel, the cobalt found in Inconel X750 and a couple of other materials Gibbs supplies, is in the alloy form, so distinct from “Cobalt Metal Powder”.

It is our view that the materials Gibbs distributes fall under occupational exposure warnings, not consumer or environmental warnings (as we do not know the extent of exposure for end use products). Thus, we believe that an SDS (Safety Data Sheet) will provide sufficient information for downstream manufactures to determine the proper labeling for their end use products.

If you have any questions, or need additional information, please contact me at verng@gibbswire.com.

Sincerely,
Vern Guetens
Director of Quality / CT Quality Manager