

August 22, 2013

Frida Vaserman
Precision Specialty Metals, Inc.
3301 Medford Street
Los Angeles, CA. 90063

Subject: REACH Regulation (EC 1907/2006)



The steel products shipped from AK Steel Corporation are in the form of coils (sheet and strip), which are classified as “finished” products in accordance with the REACH guidance documentation. Accordingly, these products are classified as “articles” which do not contain “substances” intended for release. In accordance with the REACH regulations, products classified as “articles” are not required to register their constituent “substances” (nor pre-register). Therefore, there are no registration requirements for the AK Steel Corporation products that are imported into the EU.

ECHA publishes a Candidate List of Substances of Very High Concern (SVHC) for Authorization in Annex XIV. This letter is being given with reference to the Candidate List published on June 20, 2013. This list of substances triggers notification requirements for articles if certain criteria are met, primarily the substance being present in the article at a concentration greater than 0.1%. AK Steel Corporation has reviewed this list and concluded that these substances are not present in the base steel material of its products at a concentration greater than 0.1%. The potential exists that some of these substances could be present in trace amounts in the non-metallic coatings and finishes (paints, oils, etc.) which may be applied to the base steel material to produce the final steel products. However, if these substances were present in trace amounts in any of the coatings, the residual amount of coating that remains on the steel would result in a negligible amount of the substance. This would equate to an insignificant amount of the substance relative to the total weight of the steel product, certainly substantially below 0.1% of the total product weight. Accordingly, if any of the substances were to be present in the coating materials, they would not trigger the notification requirements.

Sincerely,

Michael Kidwell

Michael Kidwell
Senior Product Specialist, Specialty Products & Marketing
AK Steel Corporation