



California Prop 65 Warning Requirements

Thursday, August 30, 2018

To Our Valued Partners,

As many of you know, on August 30, 2018 the new requirements for California's Safe Drinking and Toxic Enforcement Act of 1986 (otherwise known as Prop 65) became effective. This letter is to help you understand this complicated ruling and how it pertains to ABS, MDPE and PVC pipe. First, let us assure you we have researched and reached out to officials to see if our pipe products are in any way regulated under Prop 65.

Proposition 65 was enacted as a ballot initiative in November 1986. The proposition is intended to protect California's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm, and requires businesses to inform customers of possible hazards. The governing body of Prop 65 is OEHHA. If you go to the OEHHA Prop 65 website, <https://oehha.ca.gov/proposition-65>, you will see a list of chemicals that require a warning label. Some of the raw materials used to make pipe do have components that are listed by OEHHA.

One component is carbon black which is used to color the ABS pipe black. However, OEHHA is only regulating carbon black that is airborne and unbound particles of respirable size. The carbon black contained in our ABS pipe is bound into the ABS plastic matrix and therefore not a hazard. Even if you cut the pipe and produce saw shavings, the carbon black is still bound into the ABS plastic matrix. There is only approximately two percent carbon black in the formulation compared to 98% of ABS polymer. Even if carbon black is used to mark pipe like MDPE, studies have shown the carbon black is bound to the pipe and not regulated to Prop 65 standards.

Another component on the Prop 65 list is titanium dioxide which is used to color PVC pipe white. This is the same situation as carbon black in ABS pipe. OEHHA is only regulating airborne and unbound titanium dioxide that is of respirable size. The titanium dioxide contained in the PVC pipe we sell is bound into the PVC plastic matrix and therefore not a hazard. Even if you cut the pipe and produce saw shavings, the titanium dioxide is still bound into the PVC plastic matrix. There is only approximately two percent titanium dioxide in the formulation compared to 98% of PVC polymer.

In conclusion, with the current Prop 65 requirements, there is no need to place a hazard warning for any chemicals in our ABS, MDPE and PVC pipe products. Please feel free to call us at (661) 257-3923 with any questions you have concerning Prop 65.

VPC Global ● 28839 Industry Drive ● Valencia, CA 91355

PH. (661) 257-3923 ● FAX (661) 257-3928