



Compliance Certification North American Regulatory Profile

Last Updated: March 22, 2012

This certification applies to all grades* of the following products manufactured by U.S. Borax, Inc.

Borax Decahydrate (10 Mol)	CAS # 1303-06-4
Neobor, Borax Pentahydrate (5 Mol)	CAS # 12179-04-3
Optibor, Boric acid	CAS # 10043-35-3
Polybor, Disodium Octaborate Tetrahydrate	CAS # 12280-03-4
Dehybor, Anhydrous Borax	CAS # 1330-43-4
Boric Oxide, Anhydrous Boric Acid	CAS # 1303-06-2

*Grades include: powder, granular, fine, technical, MG, TG, TP, SQ, and NF

Dear Customer,

As Regulatory Affairs Analyst for U.S. Borax, Inc., I certify the following to be true:

Chemical Inventory

The above products are listed on the chemical inventories of the following regions generally under the CAS No. representing the anhydrous form of the salt as permitted for inorganic salts.

Inventory	Confirmation
Australia (AICS)	Yes
Canada (DSL)	Yes
China (IECSC)	Yes
European Union (EINECS)	Yes
Japan (MITI)	Yes
Korea (ECL)	Yes
New Zealand	Yes
Philippines (PICCS)	Yes
SWISS	Yes
United States (TSCA)	Yes

General Regulatory Compliance

The product(s) listed above comply with the following regulations &/or standards:

- Clean Air Act as amended 1990 (US EPA 1990 CCA)
 - Not listed as Hazardous Air Pollutant (HPA)
 - Not manufactured in the presence of Class I or II ozone depleting chemicals
- Clean Water Act (CWA) (Federal Water Pollution Control Act):
 - It is not itself a discharge covered by any water quality criteria of Section 304 of the CWA
 - It is not on the Section 307 List of Priority Pollutants
 - It is not on the Section 311 List of Hazardous Substances
- Chemical Weapon Convention – No
- CONEG model legislation regarding heavy metals in packaging and packaging ink – Compliant



- Hazard Communication Requirements in North America
 - OSHA's Hazard Communication Standard – Classified as hazardous substance
 - WHMIS (Workplace Hazardous Materials Information System) – Classified as hazardous substances under the Canadian Controlled Products Regulation of Hazardous Products Act: Subdivision D-2A - Toxic materials ☹
- POP's TREATY (Stockholm Convention) – Does not contain persistent organic pollutants
- PROP 65 (California Safe Drinking Water and Toxic Enforcement Act Proposition 65) – the products above are not listed
- Drinking Water Standards:
 - Safe Drinking Water Act (SDWA) – The products identified above are not regulated under the SDWA, 42 USC 300g-1, 40 CFR 141 et seq. Consult state and local regulations for possible water quality advisories regarding boron compounds.
 - Canadian drinking water guideline – An "Interim Maximum Acceptable Concentration" (IMAC) for boron is currently set at 5 mg B/L.
- U.S. Environmental Protection Agency
 - RCRA – The products identified above are not listed as hazardous waste under the Resource Conservation and Recovery Act (RCRA) or regulations (40 CFR 261 et seq).
 - SARA 302 – RQ/TPQ: No/No
 - SARA 311/312 – Acute: Yes, Chronic: Yes, Fire: No, Pressure: No
 - SECTION 313 SUPPLIER NOTIFICATION – The products identified above are not listed under CERCLA (Comprehensive Environmental Response Compensation and Liability Act) or its 1986 amendments, SARA (Superfund Amendments and Reauthorization Act), including substances listed under Section 313 of SARA (Emergency Planning and Community Right-To-Know Act of 1986).
 - TSCA Section 12(b) Export Notification – Not reportable

Allergen Statement

The products listed above are derived from naturally occurring mineral and inorganic chemical sources and produced in simple aqueous processes. Whilst we do not test for allergens it is reasonable to assume that they are free from potential intolerance factors including gluten that are likely to cause an allergic reaction.

Animal Derivation/Product Origin

The products listed above are derived from processed natural mineral ore. There are no animal derivatives involved or used in their manufacturing.

BSE/TSE Statement

The product(s) listed above have not been contaminated or in contact with bovine spongiform encephalopathy (BSE) nor transmissible spongiform encephalopathy (TSE).

Carcinogenicity Statement

- IARC carcinogenic status – The International Agency for Research on Cancer (IARC) (a unit of the World Health Organization) does not list or categorize the products identified above as carcinogens.
- NTP carcinogenic status – Not listed
- OSHA carcinogenic status – Not listed

GMO Statement

There are no genetically manufactured organisms (GMO) used in the manufacture of products listed above.

Halal Status

Not Halal certified.



Hazardous Components

The following chemicals are not used in the manufacturing process of the products listed above and whilst we do not specifically test for their presence it is reasonable to assume that they are absent from these products.

- Chlorine gas or hypochlorites
- Chlorophenolic containing biocide
- Class I or II ozone depleting substances
- Cyanide
- Dioxins including 2,3,7,8 -TCDD
- Endocrine disruptors
- Ethylene bis-steramide
- Ethylene Oxide (ETO)
- Formaldehyde
- Halogens (Br, Cl, F, and I)
- Heavy metals (lead, cadmium, mercury and chromium-hexavalent are not intentionally added but may be present at trace levels)
- Melamine
- Organic TIN compounds (Tributyl tin or triphenyl tin)
- Phenol compounds including alkylphenols (AP) and alkylphenol derivatives (e.g. alkylphenol ethoxylates (APE)), and bisphenol A (BPA)
- Phosphorous base organic compounds
- Phthalates (i.e. DEHP, DBP, BBP, DINP, DIDP, DONP)
- Polyaromatic compounds (PAH)
- Polychlorinated biphenyls (PCB), polychlorinated terphenyls (PCT), polybrominated biphenyls (PBB), or polybrominated diphenyl ethers (PBDE)
- Polychlorinated naphthalene
- Thiones
- Toxaphene, Hexachlorobenzene, octachlorostyrene, dieldrin, chlordane, and DDT or its metabolites
- Volatile Organic Compounds

Kosher Status

Not Kosher certified.

Nutrition Statement

Our borate products are inert and provide no known nutritional value.

Product Stewardship Programme – End-Use Areas

Some applications require agency approval, registration, or use under defined limits. To ensure compliance, U.S. Borax's Product Stewardship guidelines include the following:

National Formulary (NF) grade product status - The product meets requirements only if product label and certificate of analysis identify it as National Formulary (NF) grade. Only our National Formulary (NF) grade products may be used for external applications. RTM's NF products are labeled as 'not for internal use' and shall not be used for internal pharmaceutical or any other related application.

Drug Master File – U.S. Borax, Inc. is not required to maintain, nor do we maintain a Drug Master File for our NF products.

Pesticide formulation and/or application - U.S. Borax, Inc. products shall not be used or sold for any pesticide formulation or application except for those products which have been officially registered for such use in the country and jurisdiction of use/sale.



Post-harvest food applications – U.S. Borax, Inc. products are not intended for use in post-harvest food applications and are labeled accordingly. Therefore, our borate products shall not be used as, or in the manufacture of, food additives or preservatives, unless specifically approved.

Radiation, Irradiation, and Gamma Statement

These products, manufactured and supplied by U.S. Borax, Inc., are derived from naturally occurring mineral and inorganic chemical sources and produced in simple aqueous processes. Please note that no radiation, irradiation or gamma treatment is used during manufacture of these products.

Transportation

- Canadian Transportation of Dangerous Goods (TGD) – Not regulated under TGD
- International Transportation – The products identified above do not have UN Number(s), and are not regulated under international rail, road, water or air transport regulations.
- U.S. Department of Transportation (DOT) – Not regulated by the U.S. Department of Transportation (DOT) and is therefore not considered a hazardous material/substance.

Environmental Certification

U.S. Borax, Inc. maintains ISO 14001 certification at all locations. A copy of the current certification is available upon request from Quality Department.

Quality Certification

U.S. Borax, Inc. maintains ISO 9001 certification at all locations. A copy of the current certification is available upon request from the Quality Department.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christy Leeper".

Christy Leeper
Regulatory Affairs Analyst