

March 1, 2011

**Subject: European Union "REACH" Legislation**

The European Union (EU), through Regulation EC/1907/2006 of 18-Dec-2006, has required the registration of chemicals imported into the EU. This regulation, also known as "Regulation, Evaluation, and Authorization of CHemicals" ("REACH"), required registration of applicable substances between June 1, 2008 and December 1, 2008. Failure to register can result in the prevention of the product from being imported into the EU.

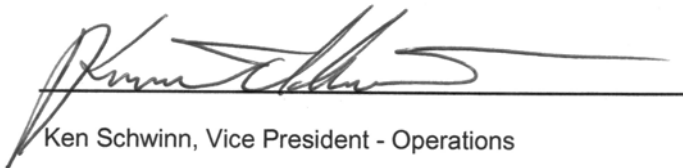
APM Hexseal has carefully studied this legislation and believes that, based on the following points, that we are in compliance with and not required to register in the REACH program.

- As of the date of this document, APM Hexseal products do NOT contain any of the SVHCs (Substances of Very High Concern) as listed on the European Chemicals Agency (ECHA) website :  
[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)
- The rubber materials contained in our products are fully cured and contain minimal volatiles and chemical residues (all products are oven aged to drive off volatiles). There are no known hazards contacting, using or disposing of these products.
- The total weight of ALL of the components in ALL APM Hexseal products exported directly to the European Union does not exceed 1(one) ton or more of cured rubber per year, an exception in the REACH legislation that does not require registration

Based on this, APM Hexseal does not believe that we are subject to the REACH registration process.

If you have questions or require further clarifications, please contact our Quality Assurance Manager, Mary Jane Cella (email: [jane@apmhexseal.com](mailto:jane@apmhexseal.com)).

Sincerely,  
APM HEXSEAL CORPORATION



Ken Schwinn, Vice President - Operations