

Date: February 29, 2016

Re: Matrix 6H & HAPS Compliance

Matrix has discontinued production of four toners – MT-17, MT-18, MT-39 and MT-43 – that contained lead and no longer has any stock of these toners in our warehouse. Although these toners have been discontinued, there is a possibility that the end user may still have these on their shelves and could be using them. Matrix currently produces three primers that contain chromium – MP-550, MP-600 and MP-900. As long as the end user does not have any of the toners and primers mentioned previously in this letter, this letter certifies that when using Matrix paints mixed as directed, the ready to spray coatings do not contain targeted HAPS (Chromium, Lead, Manganese, Nickel, or Cadmium) above the threshold concentrations of 0.1 percent by weight for OSHA Carcinogens and 1.0 percent by weight for OSHA non-carcinogens as regulated under subpart HHHHHH (6H) of CFR 63. The Matrix products (not including MT-17, MT-18, MT-39, MT-43, MP-550, MP-600 and MP-900), when mixed as directed, all qualify as exempt from 6H reporting requirements.

Some Matrix products do contain HAP solvents such as xylene; but unless end users have a potential to emit more than 10 tons per year of a single HAP or 25 tons per year of combined HAPS, then the HAPS rule does not require reporting. Based on my experience, most users of our products will not have a potential to emit that quantity of HAPS unless they are using materials containing HAPS from other suppliers in addition to the Matrix paints.

Should you have any questions concerning this information, please call me at 248-668-8141.

Sincerely,

Ronald P. Andrus
Senior Product Regulatory Specialist