



Valspar Automotive  
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Date: February 29, 2016

Re: U.S. Chemical & Plastics (USC) 6H & HAPS Compliance

This letter certifies that when using USC 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 USC products all qualify as exempt from 6H reporting requirements.

Some USC 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 USC paints.

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

Sincerely,

Ronald P. Andrus  
Senior Product Regulatory Specialist