



June 14, 2018

Re: Prop 65

Dear Customer:

As you are likely aware, changes to California's Safe Drinking Water and Toxic Enforcement Act of 1986 commonly known as "Prop 65" are scheduled to become effective in August of this year. In light of numerous inquiries as to the status of our compliance with these changes, we offer the following statement.

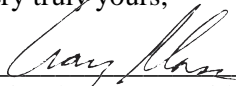
Among its many products, Rotor Clip currently offers retaining rings with Chromium (hexavalent compounds) and cadmium (military only) coatings. Both of these substances are present on the list of "Chemicals known to the State [of California] to Cause Cancer or Reproductive Toxicity" which underlies Prop 65's labeling requirements.

These products are component parts which are not sold directly to the public. While they may ultimately be incorporated into consumer goods, Rotor Clip cannot determine in advance the manner of such use or whether the attendant exposure risk will fall outside the statutory safe harbor. As such, it does not consider consumer warning labeling appropriate in accordance with guidance offered by the California Environmental Protection Agency (*see* Proposition 65 Clear and Reasonable Warnings Questions and Answers for Businesses pg. 5)¹

Rotor Clip takes a similar position with regard to occupational warnings as may be required pursuant to California's Hazard Communication Standard (Title 8, California Code of Regulations section 5194); *see also* (Title 27, California Code of Regulations section 25606), in that it cannot determine exposure risk, as it does not have knowledge of the particular manufacturing processes of its customers.

In order that you may identify effected parts, and make labeling decisions for your customers and employees, please note that all Rotor Clip part numbers for products containing cadmium include the suffix "-MCD" and all Chromium (hexavalent compounds) products include one of the following suffixes in whole or in part "-ZF,-ZD, -G, -R. Complete affected product lists, as well as MSDS data sheets are available upon request.

Very truly yours,



Craig Slass, Co-President
Rotor Clip Company, Inc.

¹ <https://oehha.ca.gov/media/downloads/cnr/art6businessqa.pdf>