



31 July 2009

Subject: Techspray REACH Statement

To Whom It May Concern:

Illinois Tool Works Inc. (ITW) and Techspray has been preparing for the requirements of the European Union (EU) Regulations on the Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH) for quite some time. ITW has consulted with outside legal and technical experts regarding REACH compliance.

The ITW Corporate Environmental, Health and Safety Group (ITW EHS) has been working directly with ITW divisions in the United States to amalgamate EU export information for affected chemical substances. ITW EHS is working indirectly with the separate legal entities of ITW both within and outside the EU in regard to REACH.

Chemical substance totals from our divisional business units, as with Techspray, have been collected and compiled. ITW has contracted Performance Polymers, an ITW company in Ireland, to act as Only Representative en masse for this group. Pre-registration of chemicals began 1 June, 2008 and runs through 30 November, 2008.

The current status of the REACH compliance program for Techspray is as follows:

- Techspray is pre-registered
- We have identified ingredients imported into EU over 1 metric ton annual threshold and sent to ITW's Only Representative.
- The following are materials from Techspray that fall beyond the 1 metric ton threshold:
 - **Copper (braid)** (CAS #7440-50-8) – used in desoldering braid (wick)
 - **1,1,1,2-tetrafluoroethane** (trade name HFC-134a, CAS#811-97-2) – used in Techspray duster and freeze spray products
- Materials imported into EU under 1 metric ton per year are not required to be reported under the current REACH directive.

We have sent Techspray's summary to ITW corporate for inclusion with other wholly-owned subsidiaries.

ITW plans to address other REACH requirements such as those pertaining to substances of Very High Concern (SVHC) and supply chain communication by the relevant REACH deadline. Techspray has only two products that contain SVHC, specifically dibutyl phthalate (CAS# 94-74-2) :

- 1720-G, 1720-5G, 1720-54G – ESD-Safe Floor Coating
- 1914-2.5S- Smoke Detector Tester

As of this writing, ECHA prioritized seven substances of the original 15 candidates in Annex XIV based on their hazardous properties, the volumes used and the likelihood of exposure to humans or the environment. Dibutyl phthalate (above) is one of the seven on the priority list. The final decision on the inclusion of the substances in the Authorisation List will be taken by the European Commission following the comitology procedure (regulatory procedure with



scrutiny). This is expected to occur toward the end of 2009. Substances on this List will in future only be able to be used within the EU when "authorised" for specific purposes.

Techspray is in compliance currently by supplying Safety Data Sheets with these products identifying dibutyl phthalate as a component. If any user requests information on SVHC, Techspray must respond within 45 days.

Please contact Pierce Pillon, Lab Manager at Techspray, or Ken Brown, Environmental Engineer for ITW, for questions or discussion regarding REACH.

Contact information:

Pierce Pillon
Lab Manager
Techspray, L.L.C.
P.O. Box 949
Amarillo, TX 79105
P: 806-372-8523 x512
F: 806-372-8750
ppillon@techspray.com

Ken Brown, CHMM
Environmental Engineer
Illinois Tool Works Inc.
3600 West Lake Ave.
Glenview, IL 60026
P: 847-657-4843
F: 847-657-7892
Kbrown@itw.com

Sincerely,

A handwritten signature in black ink that reads "Steve Cook".

Steve Cook
Director of Product Technology
Techspray, L.L.C.