

# Vendor Compliance with Hazardous Material Minimization Review Plan

## I. Purpose.

To control product life cycle costs by identifying, in advance of production, any item containing a sufficient quantity of a hazardous material such that the item when disposed would be classified as a hazardous waste.

## II. Definitions.

1. Commercial Component. A component which is available off the shelf for general industrial use.
2. Hazardous Materials. The elements and compounds listed in Table 1, with the following exceptions:
  - Trace amounts of listed material present solely as an impurity (e.g., lead in stainless steel or rubber) are not considered hazardous.
  - Except for brass or bronze with greater than one percent lead, metal alloys containing listed material are not considered hazardous.
3. Readily Available Information. Information which is:
  - Required by federal, state, or local laws and regulations to be supplied by the vendor to their customers, or
  - Previously obtained by the vendor as a result of another customer's request, or
  - Received by the vendor during normal conduct of business with their sub-tier supplier base or known by virtue of their routine interface with commercial industry. or
  - Routinely provided to the vendor by their sub-tier suppliers, or
  - Available as a result of tests performed by the vendor for other reasons.

## III. Requirements.

Vendors who receive Howell Laboratories, Inc. purchase orders with reference to this Hazardous Material Minimization Review Plan shall provide a written response via letter or report, ONLY IF the material that the vendor is providing contains one or more of the hazardous materials identified in Table 1. Lack of response will be presumed to indicate that the product does not contain any of the hazardous materials defined in Table 1.

- The content of this letter or report shall be based on readily available information as defined above, and include manufacturer's contact information.
- Identification of specific locations and amounts is required for items identified with Note 1 of Table 1.

### Table 1. Hazardous Materials

Asbestos (friable and non friable)  
Barium  
Brass and Bronze greater than 1 percent lead  
Boron Trifluoride  
Cadmium Metal  
Chromium Metal and Compounds  
Lead Metal and Compounds  
Mercury Metal and Compounds (see Note 1)  
Ozone Depleting Substances (ODSs), Class I (as defined in 40 CFR 82, Subpart A. Appendix A, except for those listed in 40 CFR 261, Subpart C)  
Polychlorinated Biphenyls (PCBs) (see Note 1)  
Selenium Compounds  
Silver Metal and Compounds

#### Note:

1. Approval is required for use of these materials.

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