

REGULATORY TECHNICAL BULLETIN

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For more information or other questions not addressed by this bulletin please contact Steelscape's Technical Service Department or your Steelscape Account Manager

The information in this Bulletin is current as of February 2019. It is possible that the laws and regulations discussed may change from time to time. While Steelscape will endeavor to issue updates to address regulatory changes, Steelscape disclaims any affirmative obligation to do so. Should you have any questions on the current applicability of any of the laws discussed herein to your product purchases, please contact Steelscape's Technical Services Department or your Account Manager.

RB1 - Overview and Summary Table

Description:

Steelscape is committed to partnering with its customers and providing comprehensive product information to meet end user needs. To help its customers, Steelscape has published this technical bulletin to address regulatory requirements commonly asked by customers and the design community.

It is important to note that if you place an order with Steelscape that needs to meet a specific building requirement, Steelscape must know about the requirement at the time of quote and order entry. Without prior notice of the requirement, Steelscape cannot guarantee the product you receive will meet the regulatory requirement for your project.

For more information or other regulations not addressed in this bulletin, please contact Steelscape's Technical Service Department or your Steelscape Account Manager.

Summary Table of Regulations:

The table below provides a simple overview of the regulations covered in this document. Please refer to the different regulation sections of this document for further detail.

Program	Status	Notes
Buy American Act (BAA)	Previously qualified. However due to changes outlined in Executive Order 13881 dated 25 January 2021. Steelscape's standard material does not comply.	For compliance, domestic hot band must be specified at time of order entry
Surface Transportation Assistance Act (STAA)	Standard products do not qualify. Steelscape can provide qualifying material upon request.	STAA domestic hot band must be specified at the time of order entry
State by State Buy American provisions / Made in USA provisions	Varies. Potential compliance.	Reviewed on a case-by-case basis. Contact Technical Service Department or your Steelscape Account Manager
American Reinvestment and Recovery Act (ARRA)	-Effective October 1st 2010, standard products do not qualify. -Steelscape can provide qualifying ARRA material upon request.	ARRA domestic hot band must be specified at the time of order entry
Site of Manufacture and Extraction	-Site of Manufacture: Kalama, WA or Rancho Cucamonga, CA -Site of extraction varies, but from multiple countries.	No site of iron ore extraction within 500 miles of Western Steel Mills
RoHS	All TruZinc® or ZINCALUME® coils ordered as dry, no chemical treatment/passivation, or with a RoHS compliant chemical treatment/passivation are RoHS and RoHS 2 compliant.	Products or resins requiring no-chemical treatment or passivation must be specified at the time of order entry
ASTM	-ZINCALUME products - ASTM A792 -TruZinc® products - ASTM A653	
Safety Data Sheets (SDS)	Multiple available. Can be downloaded from documentation library on the Steelscape website.	Prepared for each product type

RB2 - Buy American Act (BAA)

Introduction:

The Buy American Act (BAA) requires the United States government to prefer U.S.-made products in its purchases. Other pieces of Federal legislation extend similar requirements to third-party purchases that utilize Federal funds, such as highway and transit programs.

In certain government procurements, the requirement purchase may be waived if the domestic product is more expensive than an identical foreign-sourced product by a certain percentage. It may also be waived if the product is not available domestically in sufficient quantity or quality, or if doing so is in the public interest.

Definitions and Differentiation:

The Buy American Act is not to be confused with the similarly named Buy America Act, which came into effect in 1983. The latter, a provision of the Surface Transportation Assistance Act of 1982, applies only to mass-transit-related procurements valued over \$100,000 and funded at least in part by federal grants.

Executive Order 13881:

Federal Acquisition Regulation (FAR) rule changes outlined in Executive Order 13881, dated 25 January 2021, require that the domestic content of steel and iron products be 95% of total raw material costs. This reflects a change in the approach to BAA provisions in which the amended focus is on raw materials and where the steel is melted and cast. Under this strict approach, domestic processing and transformation does not change the “foreign” composition of finished steel products.

Steelscape Compliance:

Steelscape’s various metallic-coated and pre-painted products are manufactured in the United States and have historically complied with the act. However, the revisions outlined in Executive Order 13881 require raw material that is melted and cast in the US. Consequently, Steelscape’s standard material does not comply with the Executive Order. Domestically poured material in compliance with the Executive Order can be obtained upon request, subject to additional lead time. The requirement for domestically poured material must be identified at time of order entry.

Customer letters outlining this compliance, commonly used as part of project submission packages, can be obtained upon request by contacting Steelscape at (888) 553-5521 or at productinfo@steelscape.com.

RB3 - Surface Transportation Assistance Act (STAA), Buy American & Other State Content Regulations

Introduction:

The Surface Transportation Assistance Act (STAA) of 1982 provides a comprehensive transportation funding and policy act of the United States Federal Government. The Surface Transportation Assistance Act covers those federal funds distributed to the states by the Federal Highway Administration and the Federal Transit Administration for highway and mass transit (rail) projects. The Buy American provisions within the STAA are more stringent than the BAA.

Steelscape Compliance:

Standard products do not qualify. Steelscape can provide qualifying material upon request.

Steelscape may be able to purchase domestic hot band to satisfy the STAA requirements if the customer notifies Steelscape at the time of order entry.

State Buy American and Made in the USA Provisions:

Many states have their own Buy American or Made in the USA provisions. These requirements tend to vary significantly depending on the state and/or enforcing party. Steelscape frequently works with customers to assist them to achieve state based regulatory requirements.

State based requirements need to be reviewed on a case-by-case basis in order to determine if Steelscape's standard products qualify or if domestically sourced hot band is required. Please contact Steelscape's Technical Service Department or your Steelscape Account Manager for assistance with state based regulations.

Customer letters outlining compliance, commonly used as part of project submission packages, can be found in the Documentation Library within the Resource Center on the Steelscape website.

RB4 - American Reinvestment & Recovery Act (ARRA)

Introduction:

American Reinvestment and Recovery Act (ARRA) applies to construction projects that use ARRA funds. ARRA funded projects must use construction materials that are manufactured in the United States. On August 30, 2010, the government issued final guidelines on the interpretation of these guidelines for steel. The guidelines now make clear that construction materials manufactured in the United States predominantly or wholly from foreign steel do not conform to the restrictions imposed by the Buy American requirements under the ARRA. This new ruling was effective October 1, 2010, and applied to solicitations for bids issued and contracts awarded on or after October 1st.

Steelscape Compliance:

Based on this ruling effective October 1st, 2010, Steelscape's standard products do not qualify for ARRA funded projects. This may not apply if the total project cost exceeds \$7.8 million.

Steelscape may be able to purchase domestic hot band to satisfy ARRA requirements if the customer notifies us at the time of order entry.

Customer letters outlining compliance, commonly used as part of project submission packages, can be found in the Documentation Library within the Resource Center on the Steelscape website.

RB5 - Site of Extraction & Manufacture

Introduction:

Building codes and building accreditation criteria often require the identification of the point of extraction and manufacture of the building materials used. Steelscape manufactures its products in the US, however it sources material through a global supply chain resulting in extraction points across multiple countries outside of the US.

Site of Manufacture:

Steelscape proudly manufactures its products in the US. This includes metallic coating and painting. Steelscape manufactures all galvanized substrate, also known by the trade name TruZinc®, at our Kalama, Washington facility. Steelscape manufactures all Galvalume® substrate, also known by our trade name ZINCALUME®, at our Rancho Cucamonga, California facility. Both facilities have painting capabilities.

Site of Extraction:

The majority of the input materials used in Steelscape's standard products, exceeding 99% by weight, are supplied from foreign sources utilizing global extraction sites. Steelscape manufactures its products from hot band coil, in which the extraction point of the iron ore and other base components vary. Iron ore in Steelscape steel is likely from Australian, Asian, American, and other sources. Although Steelscape can source domestic hot band coil, there are no sources of iron ore extraction within the Western US region or close to Steelscape production facilities. As a result, Steelscape is confident that any material sold, was extracted more than 500 miles from any point of manufacture.

Customer letters outlining points of extraction and manufacture, commonly used as part of project submission packages, can be found in the Documentation Library within the Resource Center on the Steelscape website.

RB6 - Restriction of Hazardous Substance (RoHS)

Introduction:

RoHS is a European developed directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE). RoHS restricts the usage of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers. An updated version of this directive, RoHS 2, was released in 2011. Compared to RoHS 1, the RoHS 2 directive not only expands the scope of products covered, but also imposed new obligations on EEE manufacturers to prepare EU declaration of conformity and affix CE markings on finished products.

The RoHS directive applies to a range of equipment including, IT telecommunications, consumer, lighting (including light bulbs) and electronic equipment. It also includes toys, leisure, and sports equipment, medical devices, monitoring and control instruments, automatic dispensers and semiconductor devices.

Compliance is the responsibility of the company that puts the product on the market, as defined in the Directive, components and sub-assemblies are not responsible for product compliance. RoHS applies to products sold in the EU whether made within the EU or imported (including the US).

Steelscape Compliance:

Steelscape certifies compliance with RoHS Directive 2002/95/EC of January 27, 2003, 2005/618/EC of August 18, 2005, and RoHS2 amending directive of January 3, 2013 that its TruZinc® and ZINCALUME® coated steel coils, when supplied as dry, no chemical treatment/passivation, do not contain the below listed materials or substances in excess of the allowed thresholds.

All TruZinc® or ZINCALUME coils ordered as dry, no chemical treatment/passivation, or with a RoHS compliant chemical treatment/passivation are RoHS and RoHS 2 compliant.

Material/Substance	Threshold Level*	Yes	No	Notes, Exceptions, etc.
Cadmium (Cd)	0.01%		✓	
Hexavalent Chromium (Cr+6)	0.1%		✓	
Lead (Pb)	0.1%		✓	Exceptions: 1) Lead in glass of electronic components. 2) Lead in high melting temperature type solders (i.e. lead based solder alloys containing 85% by weight or more lead) 3) Lead in electronic ceramic parts.
Mercury (Hg)	0.1%		✓	
Polybrominated Biphenyls (PBBs)	0.1%		✓	
Polybrominated Diphenylethers (PBDEs)	0.1%		✓	

*Threshold Level, maximum concentration by weight in homogenous materials

Products requiring no chemical treatment or passivation must be specified at the time of order entry. Please note that standard PLUS resins are not RoHS compliant. RoHS compliant resins are available by special order and must be specified at order entry.

Customer letters outlining compliance, commonly used as part of project submission packages, can be found in the Documentation Library within the Resource Center on the Steelscape website.

RB7 - ASTM International Standards

Introduction:

ASTM is a not-for-profit organization which provides a forum for producers, users, consumers, and interest groups (representatives of government and academia) to meet on common ground and write standards for materials, products, systems and services.

ASTM standards are developed and used voluntarily. Standards become legally binding only when a government body references them in regulations, or when they are cited in a contract. Any item that is produced and marked as conforming to an ASTM standard must meet all applicable requirements of that standard.

ASTM standards are used comprehensively by individuals, companies and agencies. Purchasers and sellers incorporate standards into contracts and architects and designers use them in plans. Government agencies commonly refer to these standards in building codes, regulations and laws; and many other groups refer to these standards for guidance.

Steelscape Compliance:

Steelscape products are manufactured in accordance with the two relevant codes for metallic coating. The most recent versions of the respective ASTM standards include:

- For ZINCALUME® products, ASTM Standards A792
- For TruZinc® products, ASTM standard A653

Both of the above listed ASTM standards reference ASTM A924 and ASTM A568, which represent general requirements for steel production and cold rolled substrate requirements.

Customer letters outlining compliance, commonly used as part of project submission packages, can be found in the Documentation Library within the Resource Center on the Steelscape website.

RB8 - Safety Data Sheets (SDS)

Introduction:

A Safety Data Sheet (SDS) is an important component of product stewardship and workplace safety. It is intended to provide workers and emergency personnel with procedures for handling or working with the specified substance in a safe manner, and includes information such as physical data (melting point, boiling point, flash point, etc.), toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill-handling procedures.

SDSs may include instructions for the safe use and potential hazards associated with a particular material or product. An SDS is not primarily intended for use by the general consumer, focusing instead on the hazards of working with the material in an occupational setting. It is important to use an SDS specific to the product supplier, as the hazards of a product may vary between manufacturers.

Using an SDS:

Steelscape customers often require SDSs for their own use or as part of project submission requirements and Steelscape openly provides SDSs to meet these needs. However, it should be noted that for many green building programs, such as LEED or Living Building Challenge, the submission of an SDS alone does not provide sufficient information to meet these programs requirements. Steelscape has other reporting documentation specific to these programs. Please refer to the separate Suitability Technical Bulletin for further information on how Steelscape can provide the appropriate reporting documentation to meet green building requirements.

Steelscape Compliance:

Steelscape has a range of SDSs that can be downloaded from the Documentation Library within the Resource Center on the Steelscape website. These include:

- TruZinc® Steel
- TruZinc® PLUS Steel
- ZINCALUME® Steel
- ZINCALUME PLUS Steel
- Pre-Painted TruZinc®
- Pre-Painted ZINCALUME
- Painted Aluminum
- Vintage®
- Rezibond®
- Eternal Collection™
- TruzGuard™

Steelscape has a separate SDS for each product. If you cannot find the product specific SDS that you are looking for, please contact Steelscape's Technical Service Department or your Steelscape Account Manager for assistance.

The information and advice contained in this Technical Bulletin ("Bulletin") is of a general nature only and has not been prepared with your specific needs in mind. You should always obtain specialist advice to ensure that the materials, approach and techniques referred to in this Bulletin meet your specific requirements.

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