



July 22, 2013

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Conformance to IMDS and RoHS Initiatives

This letter is issued with the purpose of making it known that Essar Steel Algoma produces steel products that to the best of our knowledge, subsequent to random sampling and independent testing, are in conformance to the requirements laid out in both the IMDS and RoHS directives.

It is certified that product supplied as Hot Rolled and Cold Roll Sheet steel have a chemical content for the elements listed that falls below the levels indicated. It is to be noted that not all product supplied will be tested for compliance.

Lead (Pb)	< 0.1%
Mercury (Hg)	< 0.1%
Cadmium (Cd)	< 0.01%
Hexavalent Chromium (CrVI)	< 0.1%

A handwritten signature in black ink, appearing to read "Michael Harpe".

Michael Harpe
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ArcelorMittal

RE: Restriction of Hazardous Substances (RoHS) Directive
End of Life Vehicle Directive
Global Automotive Declarable Substance List (GADSL)

To Whom It May Concern:

The European Union has issued various directives such as the Restriction of hazardous substances in electrical and electronic equipment (RoHS) Directive 2011/65/EC and the automotive end of life vehicle (ELV) Directive 2000/53/EC Annex II (2011/37/EU). This informational letter addresses six (6) substances restricted under one or more of those Directives: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE). These six (6) restricted substances are also described in the Global Automotive Declarable Substance List (GADSL).

We do not routinely analyze for the presence of these hazardous substances because they are not a part of the manufacturing process, add no inherent quality to the product, and are typically, if present, below threshold concentrations:

1. Lead and cadmium are inherent in steel as a residual material. Lead may be present at 0.008% max (80 ppm). Lead in a galvanized coating may be present at 0.01% max (100 ppm). Cadmium may be present at 0.001% max (10 ppm). Cadmium may be present in a galvanized coating at 0.01% max (100 ppm). Mercury, if present, would be less than 0.0001% (1 ppm). Chromium is routinely added to certain steel products but our manufacturing process prevents the formation of the chromium-6 phase in the final product, with the exceptions noted below.
2. Environmentally persistent transformer fluids / flame retardants are not a part of the steel making process.

We are currently compliant in our following products:

- 1) Hot Rolled and Cold Rolled Steel Sheet (Dry or oiled)
- 2) Hot Dipped Galvanized/Galvannealed (Dry or oiled)
- 3) Galvalume and Aluminized (Dry or oiled)
- 4) Electro-galvanized steel sheet (oiled)
- 5) Black Plate (Dry or oiled)
- 6) Tinplate and Tin-Free Steel (TFS also known as ECCS- Electrolytic Chromium Coated Steel). Both contain very light coatings of trivalent chromium compounds and metallic chromium but no detectable level of hexavalent chromium.
- 7) Plate Steels

Products that are non-compliant under current standard operating practices with hexavalent chromium requirements are:

- A) Passivated/chem treated hot dipped galvanized/galvannealed, electro-galvanized, and Galvalume steel sheet
 - B) Hot dipped galvanized/galvannealed and Galvalume steel sheet that gets paintable passivation sold for post painting applications
 - C) Painted steel sheet that is toll-painted at coil coaters under single bill that have not been qualified to an alternative pretreat system
 - D) Acrylic coated Galvalume or acrylic coated hot dipped galvanized steel sheets
- These products can not be used where EU RoHS or ELV directives apply.

We have initiated trials of compliant passivated/chem treated hot dipped galvanized products. We are supplying limited amounts of such compliant product for customer trials.

This letter applies to ArcelorMittal USA light flat rolled and plate products only.

If you have interest in discussing this information further please feel free to contact me at 219-787-3277.

Best regards


Kevin Heale

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