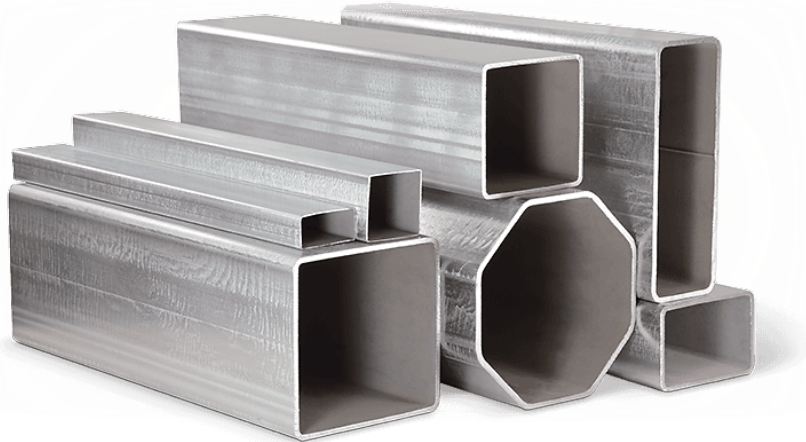


ENVIRONMENTAL PRODUCT DECLARATION

FABRICATED GALVANIZED MECHANICAL TUBING

WHEATLAND TUBE, A DIVISION OF ZEKELMAN INDUSTRIES
CHICAGO, IL



Wheatland Tube produces galvanized steel mechanical tubing for a wide range of applications — from solar racking to agricultural products, playground equipment and more. It's all readily available in a variety of shapes and finishes with the highest level of corrosion resistance.



At Wheatland Tube, we've been making it easy for our customers to stock and install our products since we began manufacturing in 1931. We trace our legacy of service all the way back to 1877, when John Maneely, the founder of Wheatland's parent company, began selling pipe, valves and fittings in Philadelphia.

Today, Wheatland is a division of Zekelman Industries, the largest independent steel pipe and tube manufacturer in North America and a leader in modular construction innovations. We're proud to serve the industry with our expansive portfolio of American-made products and best-in-class technologies that MAKE IT eZ for distributors to work with us.

The North American steel industry is the cleanest of all the major steel producing areas of the world. Of the seven largest steel producing countries, the U.S. has the lowest CO₂ emissions per ton of steel produced and the lowest intensity (AISI, 2024). Wheatland Tube is committed to maintain this fact by constantly improving our processes. For more information about Wheatland Tube and the products we offer, please visit www.wheatland.com.




ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE

Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

| | |
|--|--|
| EPD PROGRAM AND PROGRAM OPERATOR NAME, ADDRESS, LOGO, AND WEBSITE | UL Solutions 333 Pfingsten Road Northbrook, IL 60611 www.ul.com www.spot.ul.com |
| GENERAL PROGRAM INSTRUCTIONS AND VERSION NUMBER | Program Operator Rules v 2.7 2022 |
| MANUFACTURER NAME AND ADDRESS | Wheatland Tube 1 Council Avenue P.O. Box 608 Wheatland, PA 16161 |
| DECLARATION NUMBER | 4791523933.105.1 |
| DECLARED PRODUCT & DECLARED UNIT | Fabricated Galvanized Mechanical Tubing ; 1 metric ton |
| REFERENCE PCR AND VERSION NUMBER | UL Part A: Life Cycle Assessment Calculation Rules and Report Requirements, v4.0 (2022) Part B: Steel Construction Product EPD Requirements, v2.0 (2020) |
| DESCRIPTION OF PRODUCT APPLICATION/USE | Wheatland Tube produces galvanized steel mechanical tubing for a wide range of applications — from solar racking to agricultural products, playground equipment and more. It's all readily available in a variety of shapes and finishes with the highest level of corrosion resistance. |
| MARKETS OF APPLICABILITY | North America |
| DATE OF ISSUE | December 10 th , 2024 |
| PERIOD OF VALIDITY | 5 Years |
| EPD TYPE | Product-specific Type III |
| EPD SCOPE | Cradle to gate |
| YEAR(S) OF REPORTED PRIMARY DATA | October 2021 – September 2022 |
| LCA SOFTWARE & VERSION NUMBER | Sphera LCA for Experts 10.7 (formerly GaBi) |
| LCI DATABASE(S) & VERSION NUMBER | Sphera Managed LCA Content Database 2024.1 (formerly GaBi Database) |
| LCIA METHODOLOGY & VERSION NUMBER | TRACI 2.1, IPCC AR5 GWP ₁₀₀ , CML 2001-Jan 2016 ADP _{fossil} |
| Part A PCR review was conducted by: | Lindita Bushi, PhD, Chair Hugues Imbeault-Tétrault, Eng., M.A. Sc. Jack Geibig |
| The sub-category PCR review was conducted by: | Dr. Tom Gloria (Chair) Brandie Sebastian James Littlefield |
| This declaration was independently verified in accordance with ISO 14025: 2006. The UL Environment "Part A: Calculation Rules for the Life Cycle Assessment and Requirements on the Project Report," v4.0, based on CEN Norm EN 15804 (2012) and ISO 21930:2017, serves as the core PCR, with additional considerations from the USGBC/UL Environment Part A Enhancement (2017). |  Cooper McCollum, UL Solutions |
| <input type="checkbox"/> INTERNAL <input checked="" type="checkbox"/> EXTERNAL | |
| This life cycle assessment was conducted in accordance with ISO 14044 and the reference PCR by: | WAP Sustainability Consulting |

Limitations:

Environmental declarations from different programs (ISO 14025) may not be comparable. Comparison of the environmental performance of construction works and construction products using EPD information shall be based on the product's use and impacts at the construction works level. In general, EPDs may not be used for comparability purposes when not considered in a construction works context. Given this PCR ensures products meet the same functional requirements, comparability is permissible provided the information given for such comparison is transparent and the limitations of comparability explained.

When comparing EPDs created using this PCR, variations and deviations are possible. Example of variations: Different LCA software and background LCI datasets may lead to different results for upstream or downstream of the life cycle stages declared.

ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

1. Product Definition and Information

1.1. Description of Organization

At Wheatland Tube, we've been making it easy for our customers to stock and install our products since we began manufacturing in 1931. We trace our legacy of service all the way back to 1877, when John Maneely, the founder of Wheatland's parent company, began selling pipe, valves and fittings in Philadelphia.

Today, Wheatland is a division of Zekelman Industries, the largest independent steel pipe and tube manufacturer in North America and a leader in modular construction innovations. We're proud to serve the industry with our expansive portfolio of American-made products and best-in-class technologies that MAKE IT eZ for distributors to work with us.

1.2. Product Description

Our in-line galvanized mechanical tubing is manufactured in accordance with ASTM A500 specifications, and is offered flash-in or flash-controlled in a variety of galvanized finish options. Our galvanized products also comply with A1057 and A787 coating specifications. Wheatland's manufacturing facilities are registered to ISO 9001:2015. From start to finish, Wheatland's galvanized mechanical tubing is tested and inspected every step of the way — physical properties, steel chemistries, weld integrity, coating quality and dimensional specifications, as well as length, twist and straightness tolerances. Furthermore, Wheatland regularly performs destructive testing and fabrication simulations to ensure the best quality in the industry.

This EPD covers fabricated Galvanized Mechanical Tubing produced and sold from Chicago, IL.

Fabricated Galvanized Mechanical Tubing falls under CSI divisions and UNSPSC codes listed in Section 7.

Product Specification

This product is defined by the following standards:

- **ASTM A500** – Standard Specification for Cold-Formed Welded and Seamless Carbon Steel, Structural Tubing in Rounds and Shapes
- **ASTM A1057** – Standard Specification for Steel, Structural Tubing, Cold Formed, Welded, Carbon, Zinc-Coated (Galvanized) by the Hot-Dip Process
- **ASTM A787** – Standard Specification for Electric-Resistance-Welded Metallic-Coated Carbon Steel Mechanical Tubing



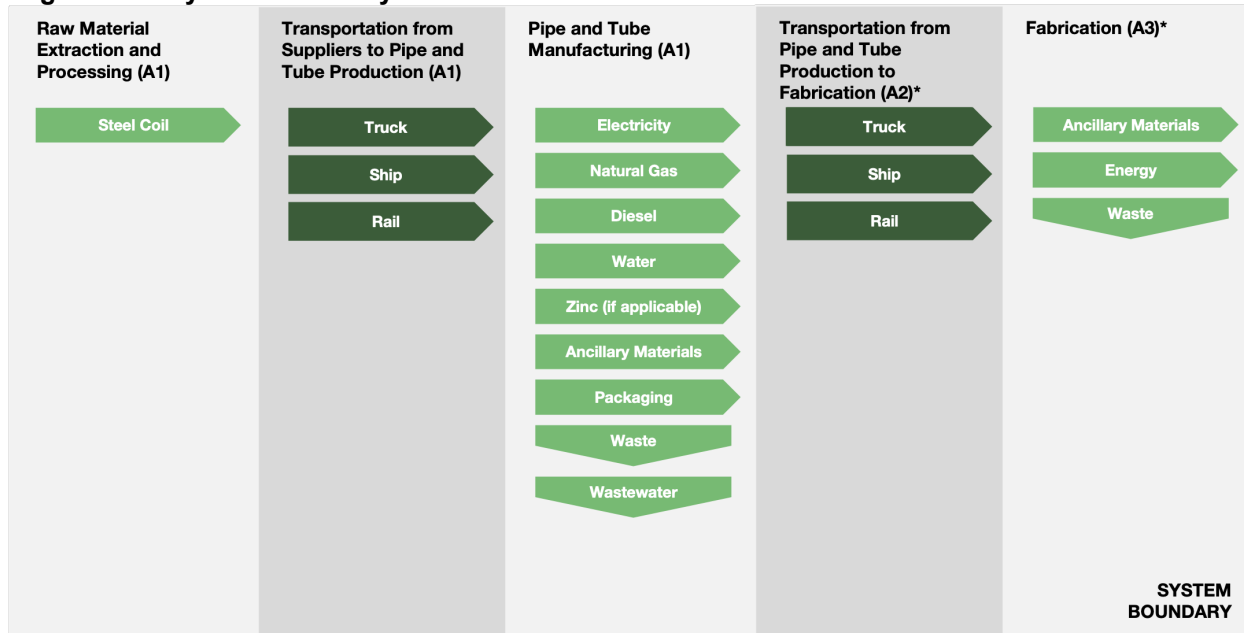
ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
 Fabricated Galvanized Mechanical Tubing
 Chicago, IL

According to ISO 14025
 and ISO 21930:2017

Flow Diagram and System Boundary



All A1 steps represent manufacturing of unfabricated tube by Wheatland Tube. Stages with an asterisk rely on data from the AISC & STI industry average EPD for fabricated HSS (AISC & STI, 2022). Use of these data is deemed appropriate for tubing since these fabrication data do not differentiate between fabrication of structural sections, steel plate, hollow structural sections, or non-structural steel. The AISC & STI EPD does not declare the modes of transportation used in A2, so it is assumed all common modes (truck, ship, rail) are used.

1.3. Application

Wheatland Tube produces galvanized steel mechanical tubing for a wide range of applications — from solar racking to agricultural products, playground equipment and more. It's all readily available in a variety of shapes and finishes with the highest level of corrosion resistance.

1.4. Material Composition

Steel tube products are made of carbon steel with a small percentage of alloy elements included. The products do not contain any hazardous substances according to the Resource Conservation and Recovery Act (RCRA), Subtitle 3. The products do not release dangerous substances to the environment, including indoor air emissions, gamma or ionizing radiation, or chemicals released to air or leached to water and soil.

1.5. Declaration of Methodological Framework

This LCA uses an attributional approach.

1.6. Manufacturing

Tube is manufactured by electric-resistance welding (ERW) steel coil into tube. Hot-rolled coil is first slit into sections of appropriate width. The narrower coils are then uncoiled and passed through a series of rollers that form the



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

continuous sheet into tube. Then the two edges of the coil are welded together.

Once welded, tube is painted on the inside and in-line hot-dip galvanized. Then, the tube is stenciled, and cut to length. Galvanized Mechanical Tubing may additionally be rolled to produce a square or rectangular shape. The tube is subsequently packaged for shipment.

The primary input into tube production is the steel itself, although small amounts of process materials are needed. Electricity is used for manufacturing and to move the materials. Manufacturing produces some metal scrap. This scrap is recycled by an external recycler.

Fabrication requires 1.08 metric tons of tube per 1 metric ton of fabricated product (AISC & STI, 2022). A1 includes production of all 1.08 metric tons of tube, A2 represents transportation to the fabrication facility, and A3 represents the fabrication activities.

1.7. Packaging

Tube is packaged with steel banding and shipped using wood dunnage and plastic film, when applicable.

As required per ISO 21930 and the Part A PCR, information on packaging is provided to specify the end-of-life scenarios used for packaging or to support development of the end-of-life scenarios for packaging at the construction works level where the A5 module is not declared. These data are provided in the table below per metric ton of fabricated tube.

Table 1. Packaging Waste Details for A5 Scenario Development, per Declared Unit of Fabricated Product

| PACKAGING WASTE | VALUE | UNIT |
|---|----------|------|
| Plastic Packaging Waste to Landfill | 1.82E-02 | kg |
| Plastic Packaging Waste to Incineration | 4.43E-03 | kg |
| Plastic Packaging Waste to Recycling | 3.56E-03 | kg |
| Steel Packaging Waste to Landfill | 4.13E-01 | kg |
| Steel Packaging Waste to Incineration | 9.70E-02 | kg |
| Steel Packaging Waste to Recycling | 1.43E+00 | kg |
| Wood Packaging Waste to Landfill | 4.71E+00 | kg |
| Wood Packaging Waste to Incineration | 1.14E+00 | kg |
| Wood Packaging Waste to Recycling | 2.14E+00 | kg |

1.8. Transportation

Transportation distances from suppliers to Wheatland Tube sites in A1 were calculated based on the supplier location and the location of manufacturing and modeled using primary data on the mode of transport.

Transportation from the tube producer to the fabricator (A2) is included in the analysis and comes from the American Institute of Steel Construction (AISC) and Steel Tube Institute (STI) EPD for fabricated HSS (AISC & STI, 2022).

1.9. Product Installation



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

Because the declared system boundary is A1-A3, product installation is not declared in this EPD.

1.10. Use

Because the declared system boundary is A1-A3, use of product is not declared in this EPD.

1.11. Reference Service Life and Estimated Building Service Life

Because the declared system boundary is A1-A3, a reference service life is not declared.

1.12. Reuse, Recycling, and Energy Recovery

Because the declared system boundary is A1-A3, reuse, recycling and energy recovery of product is not declared in this EPD.

1.13. Disposal

Because the declared system boundary is A1-A3, disposal of the product is not declared in this EPD.

2. Life Cycle Assessment Background Information

2.1. Functional or Declared Unit

The declared unit of calculation is one metric ton of fabricated tube (1,000 kg).

Table 2. Functional Unit

| NAME | VALUE | UNIT |
|---------------|-------|-------------------|
| Declared Unit | 1 | metric ton |
| Density | 7,850 | kg/m ³ |

2.2. System Boundary

The declared system boundary is cradle-to-gate. This includes the PCR life cycle modules A1, A2, and A3. Module A1 represents cradle-to-gate impacts for unfabricated tube, including raw material supply, transport of raw materials to Wheatland Tube, and manufacturing of tube by Wheatland Tube. Module A2 represents transport of unfabricated tube to fabricators, and module A3 represents fabrication of tube. The declared system boundaries are shown in Table 3.

2.3. Estimates and Assumptions

All estimates and assumptions are within the requirements of ISO 14040/44. The primary energy and ancillary material data were collected as annual totals including all utility usage and production information. For the LCA, the energy and ancillary usage information was divided by the production to use per metric ton.

Assumptions and limitations to the study have been identified as follows:

- Supplier EPDs utilized in this LCA reported all LCA results as site-specific values. In the case of some suppliers, results for resource use indicators and waste and output flows are reported as production weighted-average



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE

Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

results over multiple mills. The site-weighted average results are used in this LCA's results since they are the best data available.

- In absence of fabricator-specific data, industry average results from the AISC & STI EPD for Fabricated HSS were used to represent impacts of transport to fabrication (A2) and fabrication (A3) portions of the life cycle.
- Steel scrap generated in production is accounted for in A1 (raw materials) and A2 (transportation of raw materials), where impacts are modeled for sourcing and transporting the materials that are lost in production.
- Availability of geographically more accurate background LCI datasets would have improved the accuracy of the study.
- Since this LCA uses the cut-off approach to model recycled material in the product, no credit is given to the product system. Instead, the manufacturer realizes reduced environmental impacts through the absence of the burden of extracting virgin material.
- Only known and quantifiable environmental impacts are considered.
- Due to the assumptions and value choices listed above, The LCA does not reflect real-life scenarios and hence cannot assess actual and exact impacts, but only potential environmental impacts.

2.4. Cut-off Criteria

Input and output flows of mass and energy greater than 1% (based on total mass final product and total energy usage of the product system) or greater than 1% of environmental impacts were included within the scope of analysis. Flows less than 1% were included if sufficient data were available to warrant inclusion and/or the flow was thought to have significant environmental impact. Cumulative excluded flows and environmental impacts are less than 5% per module based on total mass, energy usage, and impacts of the product system. Where data gaps were identified, they are filled by conservative assumptions with average, generic, or proxy data and assumptions are documented.

No known flows relevant to the product system are deliberately excluded from this LCA and EPD. Some material inputs may have been excluded within the MLC datasets used for this project. All MLC datasets have been critically reviewed and conform to the exclusion requirement of the PCR, Part A: "Calculation Rules for the Life Cycle Assessment and Requirements on the Background Report."

2.5. Data Sources

Primary data were collected by facility personnel and from utility bills and were used for all manufacturing processes for fiscal year 2022, defined as October 2021 to September 2022. Whenever available, supplier data were used for raw materials used in the production process. Supplier EPDs were utilized for steel coils purchased by Wheatland Tube, when available. When primary data do not exist, secondary data for raw material production were utilized from the AISI industry average dataset for hot rolled coil in North America (AISI, 2020). Secondary data for tube manufacturing energy and materials were sourced from Sphera Managed LCA Content (fka GaBi) Database 2024.1. LCA results for transport to fabricators (A2) and fabrication (A3) were taken from the AISC & STI EPD for fabricated HSS. This data in this EPD represents fabrication activity in 2019 and 2020, intended to represent production in 2020.

2.6. Data Quality

The geographical scope of the tube manufacturing portion of the life cycle is North America. All primary data were collected from the manufacturer. The geographic coverage of primary data is considered very good.

The primary data provided by Wheatland Tube represents all information for October 2021 to September 2022. Using this data meets the PCR requirements. Time coverage of this data is considered very good. Primary data provided by Wheatland Tube are specific to technology used in manufacturing their product. They are site-specific and considered





WHEATLAND TUBE

Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

of good quality.

Supplier EPDs were utilized for representing steel coil production, where available. This data represents the technology specific to the suppliers and technological representativeness of this data is considered very good. This data represents the site-specific results for the suppliers and geographic coverage of this data is considered very good. Time coverage of EPDs ranges from 2019 to 2022 and is considered of very good quality. Supplier EPD consistency is considered good. A majority of steel supplier EPDs reported product- and site-specific results for LCIA impact categories. Supplier EPDs used consistent PCRs and LCIA methodologies for global warming potential (IPCC AR5 GWP₁₀₀) and other LCA impact categories (TRACI, with CML 2001-2016 for ADP_{fossil}). However, the LCA modeling software and databases used were not consistent across all supplier EPDs. For a majority of the steel supply, supplier EPD results were modeled in LCA FE using MLC datasets. A minority of EPD results were modeled in SimaPro using ecoinvent datasets or modeled in openLCA using ecoinvent datasets. Use of consistent LCA software and background LCA data would improve the consistency of this LCA.

When supplier EPDs were not available, this study utilized the AISI industry average dataset for hot rolled coil produced in North America (AISI, 2020). This dataset represents industry average production for 2017 in the relevant region. In absence of supplier data, time, technological, and geographical coverage of this data is considered good.

Secondary data for transport to fabricators and fabrication from AISC & STI represent fabrication activities in 2019. It represents industry average technology in the relevant region. According to AISC & STI, these fabrication data do not differentiate between fabrication of structural sections, steel plate, hollow structural sections, or non-structural steel. Therefore, use of these data is deemed appropriate for tubing. In absence of primary fabrication data, technological and geographical coverage of this data is considered good.

It is worth noting that the electricity, water, and thermal energy used in tube manufacturing includes overhead energy such as lighting and heating. Sub-metering would improve the technological coverage of data quality. Data necessary to model cradle-to-gate unit processes were sourced from Sphera Managed LCA Content (fka GaBi) datasets and critically reviewed LCAs.

2.7. Period under Review

Period under review is the manufacturer's 2022 fiscal year, defined as October 2021 to September 2022.

2.8. Allocation

General principles of allocation were based on ISO 14040/44. Where possible, allocation was avoided. No co-product allocation was applied to the primary manufacturing data. As a default, Sphera Managed LCA Content datasets use a physical mass basis for allocation.

For fabrication, allocation based on shop hours was used to separate the manufacturing of fabricated structural steel from that of fabricated non-structural steel, according to the AISC & STI industry average EPD.

Of relevance to the defined system boundary is the method in which recycled materials were handled. Throughout the study recycled materials were accounted for via the cut-off method. Under this method, impacts and benefits associated with the previous life of a raw material from recycled stock are excluded from the system boundary. Additionally, impacts and benefits associated with secondary functions of materials at end of life are also excluded (i.e., production into a third life or energy generation from the incineration plant). The study does include the impacts associated with reprocessing and preparation of recycled materials that are part of the bill of materials of the products under study.



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

3. Life Cycle Assessment Results

Table 3. Description of the system boundary modules

| PRODUCT STAGE | | | CONSTRUCTION PROCESS STAGE | | USE STAGE | | | | | | | END OF LIFE STAGE | | | | BENEFITS AND LOADS BEYOND THE SYSTEM BOUNDARY |
|---------------------|-----------|---------------|-----------------------------|-----------------------|-----------|-------------|--------|-------------|---------------|--|---|-------------------|-----------|------------------|----------|---|
| A1 | A2 | A3 | A4 | A5 | B1 | B2 | B3 | B4 | B5 | B6 | B7 | C1 | C2 | C3 | C4 | D |
| Raw material supply | Transport | Manufacturing | Transport from gate to site | Assembly/Installation | Use | Maintenance | Repair | Replacement | Refurbishment | Building Operational Energy Use During Product Use | Building Operational Water Use During Product Use | Deconstruction | Transport | Waste processing | Disposal | Reuse, Recovery, Recycling Potential |
| X | X | X | MND | MND | MND | MND | MND | MND | MND | MND | MND | MND | MND | MND | MND | MND |

X=module is declared, MND=module not declared

3.1. Life Cycle Assessment Results – Fabricated Galvanized Mechanical Tubing, Chicago, IL

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks. These six impact categories are globally deemed mature enough to be included in Type III environmental declarations. Other categories are being developed and defined and LCA should continue making advances in their development. However, the EPD users shall not use additional measures for comparative purposes.

Table 4. North American Impact Assessment Results: 1 metric ton of Fabricated Galvanized Mechanical Tubing, Chicago, IL

| IPCC AR5 GWP ₁₀₀ , TRACI, AND CML 2001-2016 | A1 | A2 | A3 | A1-A3 |
|--|----------|----------|----------|-----------------|
| GWP [kg CO ₂ eq] | 1.78E+03 | 4.46E+01 | 9.67E+01 | 1.92E+03 |
| ODP [kg CFC 11 eq] | 1.52E-05 | 8.67E-14 | 1.62E-09 | 1.52E-05 |
| AP [kg SO ₂ eq] | 5.78E+00 | 1.83E-01 | 1.52E-01 | 6.12E+00 |
| EP [kg N eq] | 1.68E+00 | 1.64E-02 | 1.23E-02 | 1.71E+00 |
| SFP [kg O ₃ eq] | 8.75E+01 | 4.44E+00 | 2.23E+00 | 9.42E+01 |
| ADP _{fossil} [MJ, LHV] | 9.69E+03 | 7.16E+01 | 1.04E+02 | 9.86E+03 |

Comparability: Comparisons cannot be made between product-specific or industry average EPDs at the design stage of a project, before a building has been specified. Comparisons may be made between product-specific or industry average EPDs at the time of product purchase when product performance and specifications have been established and serve as a functional unit for comparison. Environmental impact results shall be converted to a functional unit basis before any comparison is attempted.

Any comparison of EPDs shall be subject to the requirements of ISO 21930. EPDs are not comparative assertions and are either not comparable or have limited comparability when they have different system boundaries, are based on different product category rules or are missing relevant environmental impacts. Such comparison can be inaccurate, and could lead to erroneous selection of materials or products which are higher-impact, at least in some impact categories.



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
 Fabricated Galvanized Mechanical Tubing
 Chicago, IL

According to ISO 14025
 and ISO 21930:2017

Table 5. Resource Use: 1 metric ton of Fabricated Galvanized Mechanical Tubing, Chicago, IL

| PARAMETER | A1 | A2 | A3 | A1-A3 |
|-----------------------------|----------|----------|----------|-----------------|
| RPR _E [MJ, LHV] | 1.82E+03 | 6.24E+01 | 2.16E+02 | 2.10E+03 |
| RPR _M [MJ, LHV] | 1.63E+02 | 0.00E+00 | 0.00E+00 | 1.63E+02 |
| NRPR _E [MJ, LHV] | 2.51E+04 | 6.91E+02 | 1.47E+03 | 2.73E+04 |
| NRPR _M [MJ, LHV] | 3.15E+02 | 0.00E+00 | 1.26E+01 | 3.28E+02 |
| SM [kg] | 8.69E+02 | 0.00E+00 | 7.62E-01 | 8.70E+02 |
| RSF [MJ, LHV] | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| NRSF [MJ, LHV] | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| RE [MJ, LHV] | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| FW [m ³] | 1.14E+01 | 1.81E-01 | 6.82E-01 | 1.22E+01 |

Table 6. Output Flows and Waste Categories: 1 metric ton of Fabricated Galvanized Mechanical Tubing, Chicago, IL

| PARAMETER | A1 | A2 | A3 | A1-A3 |
|---------------|----------|----------|----------|-----------------|
| HWD [kg] | 1.10E-01 | 0.00E+00 | 3.32E-01 | 4.42E-01 |
| NHWD [kg] | 1.59E+00 | 0.00E+00 | 9.66E+00 | 1.12E+01 |
| HLRW [kg] | 1.12E-03 | 3.16E-05 | 1.18E-04 | 1.27E-03 |
| ILLRW [kg] | 9.43E-01 | 2.64E-02 | 9.85E-02 | 1.07E+00 |
| CRU [kg] | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| MR [kg] | 7.77E+01 | 0.00E+00 | 7.71E+01 | 1.55E+02 |
| MER [kg] | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| EEE [MJ, LHV] | 4.04E-01 | 0.00E+00 | 0.00E+00 | 4.04E-01 |
| EET [MJ, LHV] | 1.29E-01 | 0.00E+00 | 0.00E+00 | 1.29E-01 |



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
 Fabricated Galvanized Mechanical Tubing
 Chicago, IL

According to ISO 14025
 and ISO 21930:2017

3.2. Life Cycle Impact Assessment Results – Unfabricated Product

Table 7. Cradle-to-Gate Global Warming Potential (GWP₁₀₀) per IPCC AR5: 1 metric ton of Unfabricated Tube

| PRODUCT | SITE | CRADLE-TO-GATE, MILL PRODUCT | UNIT |
|------------------------------|-------------|------------------------------|-----------------------|
| Galvanized Mechanical Tubing | Chicago, IL | 1.65E+03 | kg CO ₂ eq |

4. Life Cycle Assessment Interpretation

For all the impact categories and products included in this EPD, tube manufacturing (A1) has the highest contribution, 93% or more, to cradle-to-gate impacts. Transportation of tube to fabricators (A2) and tube fabrication (A3) each contribute contributes less than 10% to all impact categories.

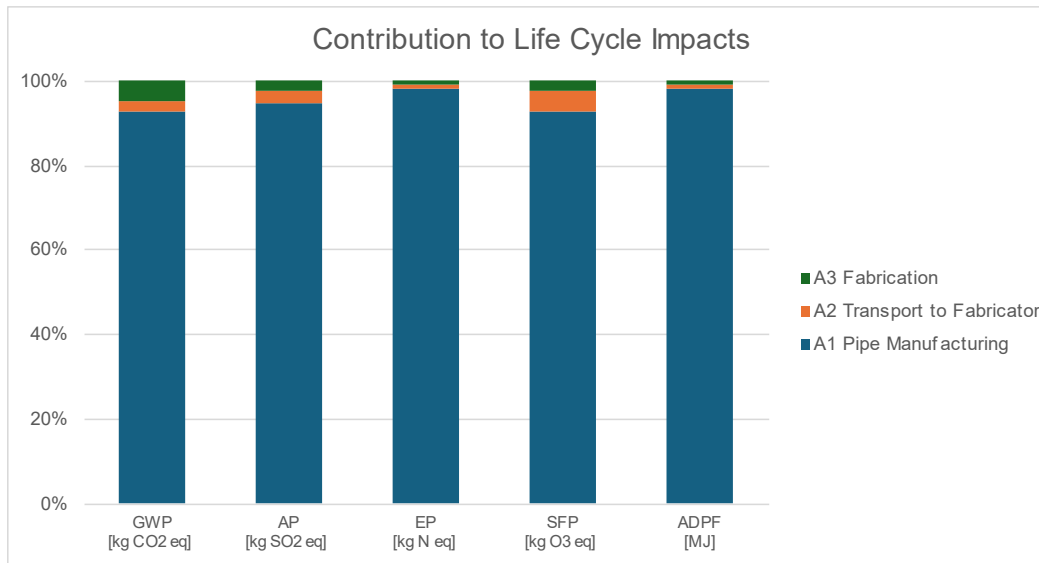


Figure 1: Fabricated Galvanized Mechanical Tubing, Chicago, IL

5. Additional Environmental Information

5.1. Environment and Health During Manufacturing

Wheatland Tube maintains an SDS of the product which contains specific Environmental, Health and Safety information of finished goods as it relates to local and international regulations. An SDS database is a centralized location in which recommended handling and regulatory exposure limits and recommended control measures can be found.

Wheatland Tube always implements compliance focused measures with regulatory requirements in mind. A proactive compliance approach is used as a guidance tool at all Wheatland Tube facilities. Each facility is accountable and held to a proactive compliance standard.

5.2. Environmental Activities and Certifications

Waste/Recycling: Wheatland Tube facilities generate very little hazardous waste streams. All locations are classified



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE

Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

as being a small quantity generator or very small quantity generator. Where feasible, Wheatland Tube recycles what would otherwise be deemed a waste, with a goal of diverting wastes from landfill. All facilities have a procedure in place to extend the life expectancy of coolant minimizing overall generated industrial waste while reducing the introduction of virgin coolant. Contaminants are continuously removed from the process allowing coolants to be reused in a closed loop system for an extended period of time.

Emissions: The process at Wheatland Tube generates minimal air emissions. Rust inhibitors used are generally water based with a very low organics content. All cleaners are either water based or federally exempt organic based materials.

Safety: Zekelman Industries understands that health and safety of its teammates are critical to the success of the organization and strives to provide a safe and healthy workplace that exceeds the most established health and safety standards. Our consistent improvements to safety and health are accomplished through the integration of safety in all teammates' daily duties and responsibilities. This has resulted in a sustainable level of safety, engagement, empowerment, and accountability throughout the organization.





WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

6. References

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ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Fabricated Galvanized Mechanical Tubing
Chicago, IL

According to ISO 14025
and ISO 21930:2017

7. Product Codes

Table 8. Product CSI Masterformat Codes

| CSI CODE | | | |
|----------|----------|----------|----------|
| 10 22 13 | 10 22 16 | 13 32 13 | 10 22 14 |

Table 9. Product UNSPSC Codes

| UNSPSC CODE |
|-------------|
| 40171501 |

