FABRICATED STEEL ELBOWS, COUPLINGS, & NIPPLES (EC&N)

WHEATLAND TUBE, A DIVISION OF ZEKELMAN INDUSTRIES CAMBRIDGE, OH



Elbows, Couplings, and Nipples (EC&N) are intended for use as metal raceways for installation of wires and cables in accordance with the National Electric Code or alternative but equal appropriate standard. These American-made conduit products are also commonly used in residential and commercial construction applications, including, but not limited to, electrical, process, fire suppression, fence framework, and mechanical energy systems.

Wheatland Tube

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 maintaining this fact by constantly improving our processes. For more information about Wheatland Tube and the products we offer, please visit www.wheatland.com.





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH



According to ISO 14025 and ISO 21930:2017

EPD PROGRAM AND PROGRAM OPERATOR NAME, ADDRESS, LOGO, AND WEBSITE	UL Solutions 333 Pfingsten RoadNorthbroc	k, IL 60611	www.ul.com www.spot.ul.com				
GENERAL PROGRAM INSTRUCTIONS AND VERSION NUMBER	UL Solutions Program Operat	or Rules v.2.7 2022					
MANUFACTURER NAME AND ADDRESS	Wheatland Tube 1 Council Avenue P.O. Box 608 Wheatland, PA 16161	1 Council Avenue P.O. Box 608					
DECLARATION NUMBER	4791523933.113.1						
DECLARED PRODUCT & DECLARED UNIT	Fabricated Steel Elbows, Cou diameter and wall thickness	plings, & Nipples (EC&N);	1 meter length at a specified				
REFERENCE PCR AND VERSION NUMBER	SmartEPD PCR Part A Produ Services, v1.01 SmartEPD PCR Part B for for	6, 7	ling and Construction Products and nications Conduit v1.0				
DESCRIPTION OF PRODUCT APPLICATION/USE	Elbows, Couplings, and Nippl installation of wires and cable but equal appropriate standar used in residential and comm	es (EC&N) are intended for s in accordance with the Na d. These American-made c ercial construction applicati					
MARKETS OF APPLICABILITY	North America						
DATE OF ISSUE	May 29, 2025						
PERIOD OF VALIDITY	5 Years						
EPD TYPE	Product-specific, facility speci	ific Type III					
EPD SCOPE	Cradle to gate with end of life	∋ (A1-A3, C1-C4, D)					
ACLCA PCR GUIDANCE CONFORMANCE LEVEL	Transparency, per ACLCA PC	CR Guidance version 1.0 (ACLCA, 2022)					
YEAR(S) OF REPORTED PRIMARY DATA	October 2021 – September 20	022					
LCA SOFTWARE & VERSION NUMBER	Sphera LCA for Experts 10.7	(formerly GaBi)					
LCI DATABASE(S) & VERSION NUMBER	Sphera Managed LCA Conter	nt Database 2024.1 (former	rly GaBi Database)				
LCIA METHODOLOGY & VERSION NUMBER	TRACI 2.1, IPCC AR5 GWP10	o, CML 2001-Jan 2016 AD	P _{fossil}				
Part A PCR review was conducted by:		Jack Geibig, Chair Terrie Boguski Hugues Imbeault-Tétrau	lt, Eng., M.A. Sc.				
The sub-category PCR review was conducted by:		Nathan Ayer (Chair) Mandy Montazeri Dale Crawford					
This declaration and background LCA report were in accordance with ISO 14025: 2006. The SmartEPD "Rules for Building and Construction Products and S 21930:2017, serves as the core PCR.	Cooper McCollum, UL S	olutions					
This life cycle assessment was conducted in accord reference PCR by:	ance with ISO 14044 and the	WAP Sustainability Cons	sulting				



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EPDs are only comparable if they comply with ISO 21930, this sub-category PCR, include all relevant information modules, and are based on equivalent scenarios with respect to the construction works context.

Limitations:

The EPD owner has sole ownership, liability, and responsibility for the EPD.

Environmental declarations from different programs (ISO 14025) may not be comparable. Comparison of the environmental performance of products using EPD information shall be based on the product's use and impacts at the building or construction works level, and therefore EPDs may not be used for comparability purposes when not considering the whole building life cycle. EPD comparability is only possible when all stages of a life cycle have been considered. However, 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.

The environmental impact results of products in this document are based on a declared unit and therefore do not provide sufficient information to established comparisons. The results shall not be used for comparisons without knowledge of how the physical properties of the product impacts the precise function at the construction level. The environmental impact results shall be converted to a functional unit basis before any comparison is attempted. For further information or to provide input on the Part A or Part B PCRs, contact SmartEPD at pc@smartepd.com. Further Explanatory materials may be obtained from UL Solutions at www.ul.com/businesses/environment.



WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

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

Established in 1877, Wheatland Tube is the only conduit manufacturer that also produces its own elbows, couplings and nipples. Our steel elbows and nipples are produced in-house from our specialized hot-dip galvanized conduit and in-line galvanized EMT, and our couplings are electroplated.

This EPD covers fabricated Steel Elbows, Couplings, & Nipples produced and sold from Cambridge, OH.

Fabricated Elbows, Couplings, & Nipples falls under CSI divisions 26 05 33, 27 05 33, and 25 05 28. Elbows fall under UNSPSC code 39131717. Couplings fall under UNSPSC code 39131707. Nipples fall under UNSPSC code 39131718.

Product Specification

Elbows are defined by the following standards:

- UL 797 Electrical Metallic Tubing Steel (Electrical metallic tubing elbows)
- UL 6 Electrical Rigid Metal Conduit Steel (Rigid metal conduit elbows)

Couplings & Nipples are defined by the following standards:

• UL 6 – Electrical Rigid Metal Conduit – Steel (Rigid metal conduit couplings & nipples)

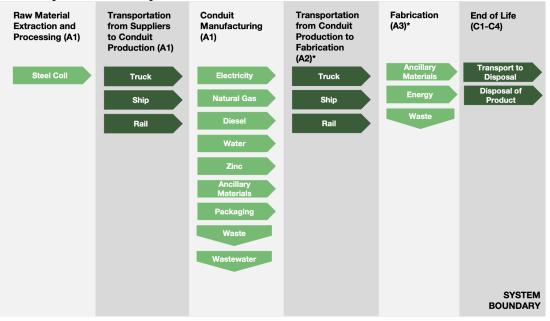


WHEATLAND TUBE

Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

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Flow Diagram and System Boundary



All A1 steps represent manufacturing of unfabricated conduit fittings 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 conduit fittings 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

Elbows, Couplings, and Nipples are intended for use as metal raceways for installation of wires and cables in accordance with the National Electric Code or alternative but equal appropriate standard. These American-made conduit products are also commonly used in residential and commercial construction applications, including, but not limited to, electrical, process, fire suppression, fence framework, and mechanical energy systems.

1.4. Material Composition

Steel conduit fittings are made of carbon steel with a small percentage of alloy elements included.

1.5. Declaration of Methodological Framework

This LCA uses an attributional approach.

1.6. Manufacturing

Environment

Conduit fittings are manufactured by either hot-forming (continuous-welding, CW) or cold-forming (electric-resistance welding, ERW) steel coil into a semi-finished conduit shell or coupling stock. 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 continuous sheet into conduit. Then the two edges of the coil are welded together and the ERW conduit is seam annealed.





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Elbows sold from Cambridge, OH, are produced from conduit shell from the following Wheatland facilities prior to galvanizing: Chicago, IL; Wheatland, PA; or Warren, OH. Elbows are galvanized at either Wheatland's Chicago, IL, or Wheatland, PA, facility prior to being transferred to Cambridge for finishing. At Cambridge, the shell is cut to length, threaded on both ends, chamfered or brushed, and bent to a specified angle to produce elbows.

Couplings sold from Cambridge, OH, are produced from coupling stock from Wheatland's Wheatland, PA facility before being transferred to Cambridge. At Cambridge, the conduit coupling stock is cut to length, faced, chamfered, and bored, and threaded on both ends to produce couplings.

Nipples sold from Cambridge, OH, are produced from conduit shell from Wheatland's Wheatland, PA facility before being transferred to Cambridge. At Cambridge, the conduit nipples are cut to length from rigid conduit shell, faced, chamfered, and threaded on both ends to produce nipples.

After production at Cambridge, couplings and nipples are electro-plated with a zinc coating by a company external to Zekelman Industries.

The primary input into conduit 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 conduit fittings per 1 metric ton of fabricated product (AISC & STI, 2022). A1 includes production of all 1.08 metric tons of conduit fittings, A2 represents transportation to the fabrication facility, and A3 represents the fabrication activities.

1.7. Packaging

Steel Conduit elbows are packaged in box quantities on skids and shrink wrapped.

Steel couplings and nipples are packed in boxes on skids and shrink wrapped.

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 for fabricated conduit fittings per m length at a 2" diameter.

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

PACKAGING WASTE	ELBOWS	COUPLINGS	NIPPLES	UNIT
Plastic Packaging Waste to Landfill	4.29E-04	6.35E-04	4.29E-04	kg
Plastic Packaging Waste to Incineration	9.86E-05	1.46E-04	9.86E-05	kg
Plastic Packaging Waste to Recycling	5.22E-05	7.72E-05	5.22E-05	kg
Steel Packaging Waste to Landfill	3.51E-03	5.19E-03	3.51E-03	kg
Steel Packaging Waste to Incineration	9.29E-04	1.38E-03	9.29E-04	kg
Steel Packaging Waste to Recycling	5.89E-03	8.74E-03	5.89E-03	kg
Wood Packaging Waste to Landfill	1.15E-02	1.70E-02	1.15E-02	kg
Wood Packaging Waste to Incineration	2.13E-03	3.15E-03	2.13E-03	kg
Wood Packaging Waste to Recycling	2.90E-02	4.28E-02	2.90E-02	kg
Biogenic Carbon Content of Packaging, Wood	4.30E-01	4.30E-01	4.30E-01	kg C/kg wood
GWP Based in Biogenic Carbon Content of Packaging, Wood	6.71E-02	9.92E-02	6.71E-02	kg CO2e





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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 conduit fittings 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

Because the declared system boundary is cradle-to-gate with end of life, product installation is not declared in this EPD.

1.10. Use

Because the declared system boundary is cradle-to-gate with end of life, 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 cradle-to-gate with end of life, a reference service life is not declared.

1.12. Reuse, Recycling, and Energy Recovery

Module D declares potential loads and benefits of secondary material, secondary fuel or recovered energy leaving the product system based on scenarios. The impacts associated with module D are calculated by identifying the point of substituted functional equivalence where the secondary material substitutes primary production and subtracting the impacts resulting from the substituted production of the product.

For conduit fittings, excess material from manufacturing including scrap steel are all fully recovered and accounted for in module D. A product recycling rate of 100% based on primary data was used for manufacturing scrap.

1.13. Disposal

At end of life, steel conduit fittings can be removed from the ground or construction works and recycled or landfilled. According to the PCR Part B section 9.4.2, the default end of life scenario in this EPD is 100% landfilling with a truck transport distance of 100 km from demolition site to end of life waste treatment site.

2. Life Cycle Assessment Background Information

2.1. Declared Unit

The declared unit of calculation is one meter length of conduit fittings at a specified diameter and wall thickness. For the declared unit, a 2" diameter is used, where wall thickness varies by product. As the LCA system boundary is cradle-to-gate with end of life, a reference service life (RSL) is not declared. Additional details for the declared unit are provided in Table 2 in SI units, and in Table 3 in optional units.





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Table 2. Declared Unit Details, SI Units

NAME	ELBOWS	COUPLINGS	NIPPLES	Unit
Declared Unit		1		meter length
Density		kg/m ³		
Outer Diameter	6.05E-02	6.73E-02	6.05E-02	m
Inner Diameter	5.28E-02	5.70E-02	5.28E-02	m
Wall Thickness	3.81E-03	m		
Linear Density, µ	5.32	7.87	5.32	kg/m

Table 3. Declared Unit Details, Optional Units

NAME	ELBOWS	COUPLINGS	NIPPLES	UNIT
Declared Unit			ft length	
Density		lbs/ft ³		
Outer Diameter	2.38	2.65	2.38	in
Inner Diameter	2.08	2.25	2.08	in
Wall Thickness	0.150	0.202	0.150	in
Linear Density, µ	35.8	52.9	35.8	lbs/10 ft

2.2. System Boundary

The declared system boundary is cradle-to-gate with end of life (A1-A3, C1-C4, D). This includes the PCR life cycle modules A1, A2, and A3. Module A1 represents cradle-to-gate impacts for unfabricated conduit fittings, including raw material supply, transport of raw materials to Wheatland Tube, and manufacturing of conduit fittings by Wheatland Tube. Module A2 represents transport of unfabricated conduit fittings to fabricators, and module A3 represents fabrication of conduit fittings. The declared system boundaries are shown in Table 6.

In primary data collected from the manufacturer, impacts from infrastructure and capital goods are excluded. Environmental impacts from infrastructure, construction, production equipment, and tools that are not directly consumed in the production process are not accounted for in the LCI. Capital equipment and buildings typically account for less than a few percent of nearly all LCIs and this is usually smaller than the error in the inventory data itself. For this project, it is assumed that capital equipment makes a negligible contribution to the impacts as per Frischknecht et al. (Frischknecht, 2007) with no further investigation.

In background datasets sourced from the Sphera MLC database, impacts of infrastructure and capital goods are included based on their relevance to environmental impacts (Sphera, 2024).

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:







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- 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 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.

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 conduit fittings 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.

Per PCR Part A, dataset details for processes that contribute 30% or more to any disclosed environmental impact category are disclosed below.





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DATABASE NAME/ DATA SOURCE	DATABASE VERSION/ PUBLICATION YEAR	DATASET NAME	GEOGRAPHY	ALLOCATION METHOD
Supplier EPD	2023	Hot rolled coil	US	Physical allocation
Supplier EPD	2023	Hot rolled coil	US	Physical allocation
Supplier EPD	2024	Hot rolled coil	US	Physical allocation
AISI Industry Average LCA	2020	Hot rolled coil	RNA	System expansion
Managed Life Cycle Content	2024.1	Thermal energy from natural gas	US	Physical allocation

2.6. Data Quality

The geographical scope of the conduit fittings 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. The Part B PCR requires that primary data be 3 years old or less. While data is greater than 3 years old upon publication, use of this data is justified since it was less than 3 years old upon submission for critical review. 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 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. While the reference year of a portion of the data is greater than 5 years old at time of study completion, the EPDs used are valid at the time of publication and use of these data is justified in absence of more recent producer-specific data. 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 and 2020, and published in 2022. It represents industry average technology in the relevant region. According to AISC & STI, these fabrication data do not 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 conduit fittings. In absence of primary fabrication data, technological and geographical coverage of this data is considered good.

Because no primary data were collected and no secondary datasets were available in the MLC database for electroplating with zinc, the A3 results from the American Galvanizers Association EPD for Hot-Dip Galvanizing were used as a proxy for electro-plating.





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It is worth noting that the electricity, water, and thermal energy used in conduit fittings 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.



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3. Life Cycle Assessment Scenarios

NAME		ELBOWS	COUPLINGS	NIPPLES	Unit
Demolition (Modul	e C1)	0	0	0	kWh
Transport (Module	C2)	100	100	100	km
Collection Process (Module C3)	Collected Separately	0	0	0	kg
	Collected with Mixed Construction Waste	5.32	7.87	5.32	kg
	Reuse	0	0	0	kg
	Recycling	0	0	0	kg
Papayany	Landfill (default)	5.32	7.87	5.32	kg
Recovery (Module C3)	Incineration	0	0	0	kg
(Incineration with Energy Recovery	0	0	0	kg
	Energy Conversion	-	-	-	
Disposal (Module C4)			7.87	5.32	kg
Removals of Bioge	enic Carbon (excluding packaging)	0	0	0	kg CO ₂

Table 4. End of Life (C1-C4) Scenarios

Even though the PCR Part B requires an assumption of 100% landfill for end-of-life (C1-C4), Wheatland Tube believes that steel conduit fittings would be recycled, and users developing their own end-of-life scenarios may consider using a recycling rate of 74% in absence of primary data. This is aligned with the recycling rate in PCR Part A Table 4 'All other metals' category.

Table 5. Reuse, Recovery, and/or Recycling (D) Scenarios

NAME	ELBOWS**	COUPLINGS	NIPPLES	Unit
Recycling Rate of Manufacturing Scrap*	100	100	100	%
Recycled Content of Product (Plant Average)	72	76	76	%
Net energy benefit from energy recovery from waste treatment declared as exported energy in C3	0	0	0	MJ
Net energy benefit from thermal energy due to treatment of waste declared as exported energy in C4	0	0	0	MJ
Net energy benefit from material flow declared in C3 for energy recovery	0	0	0	MJ
Process and conversion efficiencies	0	0	0	N/A

*For disposal of manufacturing scrap, a 100% recycling rate was used based on primary data.

**For elbows, this value is declared as a production-weighted average for the 3 different plants that produce semi-finished conduit that is formed into elbows and sold from Cambridge.

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4. Life Cycle Assessment Results

Table 6. Description of the system boundary modules

PRC	DUCT ST	ΓAGE		TRUCT- COCESS AGE		USE STAGE					END OF LIFE STAGE				BENEFITS AND LOADS BEYOND THE SYSTEM BOUNDARY	
A1	A2	A3	A4	A5	B1	B2	В3	B4	B5	B6	B7	C1	C2	C3	C4	D
Raw material supply	Transport	Manufacturing	Transport from gate to site	Assembly/Instal I	nse	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	х	х	MND	MND	MND	MND	MND	MND	MND	MND	MND	х	х	х	х	х

X=module is declared, MND=module not declared

4.1. Life Cycle Assessment Results – Fabricated Elbows, Cambridge, OH

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 7. North American Impact Assessment Results: 1 meter length of Fabricated Elbows, Cambridge, OH

IPCC AR5 GWP ₁₀₀ , TRACI, AND CML 2001-2016	A1	A2	A3	C1	C2	C3	C4	D
GWP [kg CO ₂ eq]	1.58E+01	2.37E-01	5.15E-01	0.00E+00	4.35E-02	0.00E+00	1.17E-01	-1.63E+00
ODP [kg CFC 11 eq]	2.31E-07	4.61E-16	8.62E-12	0.00E+00	1.27E-16	0.00E+00	5.51E-15	-2.70E-14
AP [kg SO ₂ eq]	4.72E-02	9.74E-04	8.09E-04	0.00E+00	1.22E-04	0.00E+00	7.46E-04	-5.28E-03
EP [kg N eq]	1.37E-02	8.73E-05	6.55E-05	0.00E+00	1.28E-05	0.00E+00	8.77E-05	-2.64E-04
SFP [kg O₃ eq]	7.14E-01	2.36E-02	1.19E-02	0.00E+00	2.77E-03	0.00E+00	1.07E-02	-6.69E-02
ADP _{fossil} [MJ, LHV]	9.79E+01	3.81E-01	5.53E-01	0.00E+00	5.65E-01	0.00E+00	1.69E+00	-1.71E+01

Comparisons cannot be made between product-specific or industry average EPDs at the design stage of a project, before a building or construction works has been specified. Comparisons may be made between product-specific or industry average EPDs at the time of product purchase only when product or construction works 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 or EN 15804. 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 comparisons can be inaccurate and could lead to erroneous selection of materials or products that are higher-impact, at least in some impact categories.





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

Table 8. Resource Use: 1 meter length of Fabricated Elbows, Cambridge, OH

PARAMETER	A1	A2	A3	C1	C2	C3	C4	D
RPR _E [MJ, LHV]	1.65E+01	3.32E-01	1.15E+00	0.00E+00	2.52E-02	0.00E+00	2.16E-01	-2.32E+00
RPR _M [MJ, LHV]	8.69E-01	0.00E+00						
RPR⊤ [MJ, LHV]	1.73E+01	3.32E-01	1.15E+00	0.00E+00	2.52E-02	0.00E+00	2.16E-01	-2.32E+00
NRPR _E [MJ, LHV]	2.19E+02	3.68E+00	7.82E+00	0.00E+00	5.69E-01	0.00E+00	1.74E+00	-1.80E+01
NRPR _M [MJ, LHV]	3.65E+00	0.00E+00	6.71E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NRPR⊤ [MJ, LHV]	2.23E+02	3.68E+00	7.89E+00	0.00E+00	5.69E-01	0.00E+00	1.74E+00	-1.80E+01
SM [kg]	5.96E+00	0.00E+00	4.06E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RSF [MJ, LHV]	0.00E+00							
NRSF [MJ, LHV]	0.00E+00							
RE [MJ, LHV]	0.00E+00							
FW [m ³]	8.36E-02	9.63E-04	3.63E-03	0.00E+00	8.37E-05	0.00E+00	2.25E-04	-1.04E-01
BCRK [kg CO ₂] ¹	8.03E-02	0.00E+00						

Table 9. Output Flows and Waste Categories: 1 meter length of Fabricated Elbows, Cambridge, OH

PARAMETER	A1	A2	A3	C1	C2	C3	C4	D
HWD [kg]	1.38E-01	0.00E+00	1.77E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NHWD [kg]	1.14E-02	0.00E+00	5.14E-02	0.00E+00	0.00E+00	0.00E+00	5.32E+00	0.00E+00
HLRW [kg]	8.90E-06	1.68E-07	6.28E-07	0.00E+00	2.03E-09	0.00E+00	2.07E-08	-5.01E-07
ILLRW [kg]	7.40E-03	1.41E-04	5.24E-04	0.00E+00	1.71E-06	0.00E+00	1.85E-05	-4.40E-04
CRU [kg]	0.00E+00							
MR [kg]	2.54E+00	0.00E+00	4.10E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
MER [kg]	0.00E+00							
EEE [MJ, LHV]	2.14E-02	0.00E+00						
EET [MJ, LHV]	9.02E-03	0.00E+00						

¹ Other biogenic carbon indicators are equal to 0 and are therefore not reported in results tables.





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

4.2. Life Cycle Assessment Results – Fabricated Couplings, Cambridge, OH

Table 10. North American Impact Assessment Results: 1 meter length of Fabricated Couplings, Cambridge, OH

IPCC AR5 GWP ₁₀₀ , TRACI, AND CML 2001-2016	A1	A2	A3	C1	C2	C3	C4	D
GWP [kg CO ₂ eq]	2.30E+01	3.51E-01	7.61E-01	0.00E+00	6.43E-02	0.00E+00	1.74E-01	-1.11E+00
ODP [kg CFC 11 eq]	4.41E-07	6.82E-16	1.27E-11	0.00E+00	1.88E-16	0.00E+00	8.15E-15	2.78E-14
AP [kg SO ₂ eq]	6.01E-02	1.44E-03	1.20E-03	0.00E+00	1.81E-04	0.00E+00	1.10E-03	-2.15E-03
EP [kg N eq]	2.25E-02	1.29E-04	9.68E-05	0.00E+00	1.89E-05	0.00E+00	1.30E-04	-1.29E-04
SFP [kg O₃ eq]	1.01E+00	3.49E-02	1.75E-02	0.00E+00	4.09E-03	0.00E+00	1.58E-02	-2.35E-02
ADP _{fossil} [MJ, LHV]	1.04E+02	5.63E-01	8.18E-01	0.00E+00	8.35E-01	0.00E+00	2.50E+00	-1.26E+01

Table 11. Resource Use: 1 meter length of Fabricated Couplings, Cambridge, OH

PARAMETER	A1	A2	A3	C1	C2	C3	C4	D
RPR _E [MJ, LHV]	1.42E+01	4.91E-01	1.70E+00	0.00E+00	3.72E-02	0.00E+00	3.19E-01	3.80E-01
RPR _M [MJ, LHV]	1.28E+00	0.00E+00						
RPR⊤ [MJ, LHV]	1.55E+01	4.91E-01	1.70E+00	0.00E+00	3.72E-02	0.00E+00	3.19E-01	3.80E-01
NRPR _E [MJ, LHV]	3.27E+02	5.44E+00	1.16E+01	0.00E+00	8.42E-01	0.00E+00	2.58E+00	-1.22E+01
NRPR _M [MJ, LHV]	6.53E+00	0.00E+00	9.91E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NRPR⊤ [MJ, LHV]	3.34E+02	5.44E+00	1.17E+01	0.00E+00	8.42E-01	0.00E+00	2.58E+00	-1.22E+01
SM [kg]	8.80E+00	0.00E+00	6.00E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RSF [MJ, LHV]	0.00E+00							
NRSF [MJ, LHV]	0.00E+00							
RE [MJ, LHV]	0.00E+00							
FW [m ³]	9.51E-02	1.42E-03	5.37E-03	0.00E+00	1.24E-04	0.00E+00	3.33E-04	-1.07E-01
BCRK [kg CO ₂]	1.19E-01	0.00E+00						

Table 12. Output Flows and Waste Categories: 1 meter length of Fabricated Couplings, Cambridge, OH

PARAMETER	A1	A2	A3	C1	C2	C3	C4	D
HWD [kg]	2.50E-01	0.00E+00	2.61E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NHWD [kg]	1.22E-02	0.00E+00	7.60E-02	0.00E+00	0.00E+00	0.00E+00	7.87E+00	0.00E+00
HLRW [kg]	9.81E-06	2.49E-07	9.28E-07	0.00E+00	3.01E-09	0.00E+00	3.06E-08	-2.26E-08
ILLRW [kg]	7.99E-03	2.08E-04	7.75E-04	0.00E+00	2.53E-06	0.00E+00	2.74E-05	-1.87E-05
CRU [kg]	0.00E+00							
MR [kg]	2.71E+00	0.00E+00	6.07E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
MER [kg]	0.00E+00							
EEE [MJ, LHV]	3.71E-02	0.00E+00						
EET [MJ, LHV]	1.58E-02	0.00E+00						





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

4.3. Life Cycle Assessment Results – Fabricated Nipples, Cambridge, OH

Note that Elbows sold from Cambridge can be produced from galvanized shell that was milled at Chicago, Wheatland, or Warren. Results are presented as a weighted average based on production volume of each milling scenario. Table 13. North American Impact Assessment Results: 1 meter length of Fabricated Nipples, Cambridge, OH

IPCC AR5 GWP ₁₀₀ , TRACI, AND CML 2001-2016	A1	A2	A3	C1	C2	C3	C4	D	
GWP [kg CO ₂ eq]	1.55E+01	2.37E-01	5.15E-01	0.00E+00	4.35E-02	0.00E+00	1.17E-01	-7.48E-01	
ODP [kg CFC 11 eq]	2.99E-07	4.61E-16	8.62E-12	0.00E+00	1.27E-16	0.00E+00	5.51E-15	1.88E-14	
AP [kg SO ₂ eq]	4.07E-02	9.74E-04	8.09E-04	0.00E+00	1.22E-04	0.00E+00	7.46E-04	-1.45E-03	
EP [kg N eq]	1.52E-02	8.73E-05	6.55E-05	0.00E+00	1.28E-05	0.00E+00	8.77E-05	-8.75E-05	
SFP [kg O₃ eq]	6.86E-01	2.36E-02	1.19E-02	0.00E+00	2.77E-03	0.00E+00	1.07E-02	-1.59E-02	
ADP _{fossil} [MJ, LHV]	7.05E+01	3.81E-01	5.53E-01	0.00E+00	5.65E-01	0.00E+00	1.69E+00	-8.49E+00	
Table 14. Resource Use: 1 meter length of Fabricated Nipples, Cambridge, OH									
PARAMETER	A1	A2	A3	C1	C2	C3	C4	D	
RPR _E [MJ, LHV]	9.59E+00	3.32E-01	1.15E+00	0.00E+00	2.52E-02	0.00E+00	2.16E-01	2.57E-01	
RPR _M [MJ, LHV]	8.69E-01	0.00E+00							
RPR⊤ [MJ, LHV]	1.05E+01	3.32E-01	1.15E+00	0.00E+00	2.52E-02	0.00E+00	2.16E-01	2.57E-01	
NRPR _E [MJ, LHV]	2.21E+02	3.68E+00	7.82E+00	0.00E+00	5.69E-01	0.00E+00	1.74E+00	-8.25E+00	
NRPR _M [MJ, LHV]	4.42E+00	0.00E+00	6.71E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
NRPR⊤ [MJ, LHV]	2.26E+02	3.68E+00	7.89E+00	0.00E+00	5.69E-01	0.00E+00	1.74E+00	-8.25E+00	
SM [kg]	5.96E+00	0.00E+00	4.06E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
RSF [MJ, LHV]	0.00E+00								
NRSF [MJ, LHV]	0.00E+00								
RE [MJ, LHV]	0.00E+00								
FW [m ³]	6.43E-02	9.63E-04	3.63E-03	0.00E+00	8.37E-05	0.00E+00	2.25E-04	-7.21E-02	
BCRK [kg CO ₂]	8.03E-02	0.00E+00							

Table 15. Output Flows and Waste Categories: 1 meter length of Fabricated Nipples, Cambridge, OH

PARAMETER	A1	A2	A3	C1	C2	C3	C4	D
HWD [kg]	1.69E-01	0.00E+00	1.77E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NHWD [kg]	8.22E-03	0.00E+00	5.14E-02	0.00E+00	0.00E+00	0.00E+00	5.32E+00	0.00E+00
HLRW [kg]	6.64E-06	1.68E-07	6.28E-07	0.00E+00	2.03E-09	0.00E+00	2.07E-08	-1.53E-08
ILLRW [kg]	5.41E-03	1.41E-04	5.24E-04	0.00E+00	1.71E-06	0.00E+00	1.85E-05	-1.27E-05
CRU [kg]	0.00E+00							
MR [kg]	1.83E+00	0.00E+00	4.10E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
MER [kg]	0.00E+00							
EEE [MJ, LHV]	2.51E-02	0.00E+00						
EET [MJ, LHV]	1.07E-02	0.00E+00						





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According to ISO 14025 and ISO 21930:2017

4.4. Life Cycle Impact Assessment Results – Unfabricated Product

Table 16. Cradle-to-Gate Global Warming Potential (GWP100) per IPCC AR5: 1 m length of Unfabricated Conduit Fittings

Product	Site	CRADLE-TO-GATE, MILL PRODUCT	Unit
Elbows	Cambridge, OH	1.46E+01	kg CO ₂ eq
Couplings	Cambridge, OH	2.13E+01	kg CO ₂ eq
Nipples	Cambridge, OH	1.44E+01	kg CO ₂ eq

5. Life Cycle Assessment Interpretation

For all the impact categories and products included in this EPD, conduit fittings manufacturing (A1) has the highest contribution, 95% or more, to cradle-to-gate impacts. Transportation of conduit fittings to fabricators (A2) and conduit fittings fabrication (A3) each contribute contributes less than 10% to all impact categories.

Across all impact categories, end of life stage (C1-C4) contributes minimally to environmental impacts over the system boundary. For most impact categories, C1-C4 contributes up to 2%. At a maximum, C1-C4 contributes 4% to ADPF.

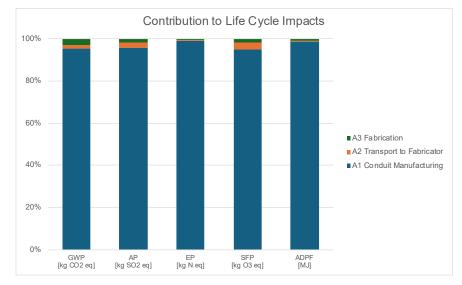


Figure 1: Cradle-to-Gate Impacts for Fabricated Elbows, Couplings, and Nipples, All Sites

Module D contributions to impacts across a majority of impact categories are dominated by zinc scrap sent to recycling in the galvanizing process at Wheatland or Chicago, depending on the product. One exception is FW, dominated by steel scrap sent to recycling because of the dataset used to estimate benefits in the next product system for steel scrap sent to recycling. For products processed at Cambridge, module D impacts are higher for some categories due to a significantly higher amount of steel scrap sent to recycling. Contributions to module D from other materials recycled or recovery of energy from disposal of manufacturing waste are insignificant.





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

6. Additional Environmental Information

6.1. 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.

See Appendix for information on regulated substances.

6.2. Environmental Activities and Certifications

Waste/Recycling: Wheatland Tube facilities generate very little hazardous waste streams. All locations are classified 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 Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

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8. Impact Scaling Factors

For each product, results are provided for 1 m length of conduit fittings at 2" diameter and specified wall thickness. To account for application-specific contexts, declared unit scaling factors are provided for each product based on the following formula from Part B PCR section 5.3.3.

The conduit fittings impacts are equal to the conduit fittings scaling factor in the following tables, multiplied by the impact per m for the 2" diameter product.

For example, to find the cradle-to-gate GWP of 1 m of unfabricated 3" diameter elbows produced at Cambridge, GWP of unfabricated 2" diameter elbows (14.6) is multiplied by the scaling factor *per m* for 3" size (2.02). This calculation is equal to 29.5 kg CO₂ eq/m unfabricated elbows with 3" diameter.

Similarly, to find the cradle-to-gate GWP of 10 ft of unfabricated 2" diameter elbows produced at Cambridge, GWP of unfabricated 2" diameter elbows (14.6) is multiplied by the scaling factor *per 10 ft* for 2" size (3.05). This calculation is equal to 44.5 kg CO₂ eq/m unfabricated elbows with 2" diameter.

TRADE Size (in)	OUTER DIAMETER (M)	Inner Diameter (m)	WALL THICKNESS (M)	LINEAR DENSITY µ (KG/M)	SCALING FACTOR (PER M)	Scaling Factor (per 10 ft)
1/2	2.13E-02	1.61E-02	2.64E-03	1.22E+00	2.29E-01	6.97E-01
3⁄4	2.67E-02	2.12E-02	2.72E-03	1.61E+00	3.02E-01	9.19E-01
1	3.35E-02	2.69E-02	3.30E-03	2.46E+00	4.62E-01	1.41E+00
1 1⁄4	4.22E-02	3.53E-02	3.43E-03	3.28E+00	6.15E-01	1.88E+00
1 1⁄2	4.83E-02	4.11E-02	3.56E-03	3.92E+00	7.37E-01	2.25E+00
2	6.05E-02	5.28E-02	3.81E-03	5.32E+00	1.00E+00	3.05E+00
2 1⁄2	7.32E-02	6.32E-02	4.95E-03	8.33E+00	1.57E+00	4.77E+00
3	8.89E-02	7.85E-02	5.21E-03	1.07E+01	2.02E+00	6.16E+00
3 1/2	1.02E-01	9.07E-02	5.46E-03	1.29E+01	2.43E+00	7.42E+00
4	1.14E-01	1.03E-01	5.72E-03	1.53E+01	2.88E+00	8.76E+00
5	1.41E-01	1.29E-01	6.22E-03	2.07E+01	3.89E+00	1.19E+01
6	1.68E-01	1.55E-01	6.86E-03	2.73E+01	5.13E+00	1.56E+01

Table 17. Impact Scaling Factors for Elbows and Nipples





WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

Table 18. Impact Scaling Factors for Couplings

TRADE Size (in)	Outer Diameter (m)	Inner Diameter (m)	WALL THICKNESS (M)	LINEAR DENSITY μ (KG/M)	Scaling Factor (per m)	Scaling Factor (per 10 ft)
1/2	2.57E-02	1.87E-02	3.48E-03	1.90E+00	2.42E-01	7.37E-01
3⁄4	3.18E-02	2.42E-02	3.78E-03	2.61E+00	3.32E-01	1.01E+00
1	3.87E-02	3.01E-02	4.29E-03	3.65E+00	4.63E-01	1.41E+00
1 1⁄4	4.75E-02	3.91E-02	4.17E-03	4.45E+00	5.65E-01	1.72E+00
1 1⁄2	5.47E-02	4.50E-02	4.88E-03	6.00E+00	7.62E-01	2.32E+00
2	6.73E-02	5.70E-02	5.13E-03	7.87E+00	1.00E+00	3.05E+00
2 1⁄2	8.26E-02	6.86E-02	6.99E-03	1.30E+01	1.65E+00	5.04E+00
3	9.83E-02	8.45E-02	6.91E-03	1.56E+01	1.98E+00	6.03E+00
3 1/2	1.24E-01	1.09E-01	7.39E-03	2.12E+01	2.70E+00	8.22E+00
4	1.52E-01	1.37E-01	7.70E-03	2.75E+01	3.49E+00	1.06E+01
5	1.83E-01	1.64E-01	9.65E-03	4.12E+01	5.24E+00	1.60E+01
6	2.57E-02	1.87E-02	3.48E-03	1.90E+00	2.42E-01	7.37E-01



WHEATLAND TUBE Fabricated Steel Elbows, Couplings, & Nipples (EC&N) Cambridge, OH

According to ISO 14025 and ISO 21930:2017

Appendix: Regulated Substances

Per the PCR Part A section 8.4.1 Regulated Hazardous Substances, the substances contained in the construction product that are identified as hazardous according to normative requirements in standards and regulations in the applicable EPD market shall be disclosed in this report and the EPD. The description of regulated substance, CAS number, and reference regulations shall be identified as below.

Materials or chemicals required to be disclosed on a product safety data sheet per OSHA Hazardous Communication Standard, RCRA Subtitle C, EPCRA Section 302, CERCLA Hazardous Substances, and California State Proposition 65 are listed in the SDS at https://www.wheatland.com/wp-content/uploads/2017/12/Safety-Data-Sheet-1.pdf.

To demonstrate compliance with the Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs Regulation), Wheatland Tube, LLC to the best of its knowledge does not use any listed POPs in any of its processes and they are not a component of finished products. Please note the POPs list is subject to change therefore this declaration applies to the pollutants list as of March 7, 2025.

The following chemical agents are required to be reported per the US EPA Toxic Release Inventory, EPCRA section 313, and EPA Clean Air Act by site:

REGULATION	SUBSTANCE	CAS	CHICAGO, IL	WHEATLAND, PA	CAMBRIDGE, OH	WARREN, OH
EPA TRI, EPCRA, EPA CAA	1,2,4 trimethylbenzene	95-63-6	х			
EPA CAA	Acetone	67-64-1	х			
EPA TRI, EPCRA, EPA CAA	Ammonia	7664-41-7		х		
EPA CAA	Arsenic	7440-38-2		x		
EPA CAA	Barium	7440-39-3		х		
EPA CAA	Benzene	71-43-2		x		
EPA CAA	Butane	106-97-8		х		
EPA CAA	Cadmium	7440-43-9		x		
EPA CAA	Carbon Dioxide	124-38-9	x	х		
EPA CAA	Carbon Monoxide	630-08-0	x	x		
EPA CAA	Chromium	7440-47-3		х		
EPA TRI, EPCRA	Chromium compounds	N090		x		
EPA CAA	Condensable PM	n/a		х		
EPA CAA	Copper	7440-50-8		x		
EPA CAA	Dimethyl Carbonate	616-38-6	x			
EPA CAA	Ethane	74-84-0		x		
EPA CAA	Formaldehyde	50-00-0		х		
EPA TRI, EPCRA, EPA CAA	Glycol ethers	N230	x			
EPA CAA	Hexane	110-54-3		х		
EPA TRI, EPCRA, EPA CAA	Hydrochloric acid aerosols	7647-01-0	x			
EPA TRI, EPCRA, EPA CAA	Lead	7439-92-1	x	х		х
EPA TRI, EPCRA	Lead compounds	N420		x		
EPA TRI, EPCRA, EPA CAA	Manganese	7439-96-5		х		х
EPA TRI, EPCRA	Manganese compounds	N450		x		

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EPA CAA	Morouny	7439-97-6		v		
	Mercury			x		
EPA CAA	Methane	74-82-8	X	X		
EPA CAA	Molybdenum	7439-98-7		х		
EPA CAA	Naphthalene	91-20-3		x		
EPA CAA	Nickel	7440-02-0		х		
EPA CAA	Nitrous Oxide	10024-97-2	x			
EPA CAA	NOx	10102-44-0	х			
EPA CAA	NOx	10102-43-9		x		
EPA CAA	Pentane	109-66-0		х		
EPA CAA	PM unspecified	n/a	x			
EPA CAA	PM10	n/a	х	х		
EPA CAA	PM2. 5	n/a	x	x		
EPA CAA	Propane	74-98-6		х		
EPA CAA	SOx	9029-22-5		х		
EPA CAA	Sulfur Dioxide	7446-09-5	х			
EPA TRI, EPCRA, EPA CAA	Toluene	108-88-3	х			
EPA CAA	Vanadium	7440-62-2		х		
EPA CAA	VOC	n/a		х		
EPA CAA	Volatile Organic Materials	n/a	х			
EPA TRI, EPCRA, EPA CAA	Xylene	1330-20-7	х			
EPA TRI, EPCRA, EPA CAA	Zinc (fume or dust)	7440-66-6	х	х		
EPA TRI, EPCRA	Zinc compounds	N982	x	x	x	x