

ENVIRONMENTAL PRODUCT DECLARATION

ELECTRICAL METALLIC TUBING

WHEATLAND TUBE, A DIVISION OF ZEKELMAN INDUSTRIES
ROCHELLE, IL – AVERAGE EAF STEEL SUPPLY MIX



Electrical Metallic Tubing (EMT), including EMT Elbows, 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.



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



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Rochelle, IL– Average EAF Steel Supply Mix



According to ISO 14025
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EPD PROGRAM AND PROGRAM OPERATOR NAME, ADDRESS, LOGO, AND WEBSITE	UL Solutions 333 Pfingsten Rd, Northbrook IL, 60062 www.ul.com www.spot.ul.com
GENERAL PROGRAM INSTRUCTIONS AND VERSION NUMBER	UL Solutions Program Operator Rules v.2.7 2022
MANUFACTURER NAME AND ADDRESS	Zekelman Industries 191 N Wacker Dr. Suite 2100 Chicago, IL 60606
DECLARATION NUMBER	4792305467.101.1
DECLARED PRODUCT & DECLARED UNIT	Electrical Metallic Tubing; 1 meter length at a specified diameter and wall thickness
REFERENCE PCR AND VERSION NUMBER	Smart EPD PCR Part A Product Category Rules for Building and Construction Products and Services, v1.2 Smart EPD PCR Part B for for Electrical and Telecommunications Conduit v1.0
DESCRIPTION OF PRODUCT APPLICATION/USE	Electrical Metallic Tubing (EMT), including EMT Elbows 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.
MARKETS OF APPLICABILITY	North America
DATE OF ISSUE	October 2 nd , 2026
PERIOD OF VALIDITY	5 Years
EPD TYPE	Product-specific, facility specific Type III
EPD SCOPE	Cradle to gate with end of life (A1-A3, C1-C4, D)
ACLCA PCR GUIDANCE CONFORMANCE LEVEL	Transparency, per ACLCA PCR Guidance version 1.0 (ACLCA, 2022)
YEAR(S) OF REPORTED PRIMARY DATA	October 2024 – September 2025
LCA SOFTWARE & VERSION NUMBER	Sphera LCA for Experts 10.9 (formerly GaBi)
LCI DATABASE(S) & VERSION NUMBER	Sphera Managed LCA Content Database 2026.1 (formerly GaBi Database)
LCIA METHODOLOGY & VERSION NUMBER	IPCC AR6 GWP100, TRACI 2.2
Part A PCR review was conducted by:	Jack Geibig, Chair Terrie Boguski Hugues Imbeault-Tétrault, 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 independently verified in accordance with ISO 14025: 2006. The Smart EPD “Part A: Product Category Rules for Building and Construction Products and Services,” v1.2, based on ISO 21930:2017, serves as the core PCR. ☐ INTERNAL ☒ EXTERNAL	Cooper McCollum, UL Solutions 
This life cycle assessment was conducted in accordance with ISO 14044 and the reference PCR by:	WAP Sustainability Consulting

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 differences in results upstream or downstream of the life cycle stages declared. EPDs are only comparable if they conform 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.
A manufacturer shall not make claims based on an industry-average EPD which leads the market to believe the industry-average is representative of manufacturer-specific or product-specific results.

ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL— Average Steel EAF Supply Mix

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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

Wheatland Tube manufactures steel EMT in America, using the latest technology and protocols to ensure the highest quality. Our proprietary smooth ID coating enables up to 20% faster wire pulling. The light-wall EMT's mechanical properties allow for easy hand-bending on small sizes and a smooth bend on intermediate and larger sizes. Plus, all sizes are readily available for next-day delivery from 21 stocking locations. That's how we MAKE IT eZ.

This EPD covers Electrical Metallic Tubing produced and sold from Rochelle, IL using an average electric arc furnace (EAF) steel supply mix for the reference period.

Electrical Metallic Tubing falls under CSI divisions 26 05 33, 27 05 33, and 25 05 28. The product falls under UNSPSC code 39131719.

Product Specification

This product is defined by the following standards:

- UL 797 – Electrical Metallic Tubing – Steel

1.3. Application

Electrical Metallic Tubing (EMT), including EMT Elbows, 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

The product is made of carbon steel with a small percentage of alloy elements and coatings included, as applicable.

Steel scrap content is reported using primary supplier data, where available. In absence of primary data, the secondary material indicator from supplier-specific EPDs is used as a proxy. Because the source of recycled content is unknown, source of recycled content is based on Wheatland Tube's estimate that approximately 30% of recycled content in purchased steel is pre-consumer scrap and 70% is post-consumer scrap (Wheatland Tube, 2026). Home scrap is not considered recycled content. Recycled content in the material composition tables is calculated using the recycled content per supplier multiplied by the percent mass each facility sources from each supplier during the reference period.

Material composition is provided per declared unit in Table 1. Mass of coatings per declared unit varies with dimensions of the product and is hence excluded from the material composition tables.



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

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Table 1. Material Composition

MATERIAL	PRODUCT FROM ROCHELLE, IL
Total Alloys and Other Iron Units	20.9%
Steel Scrap, Pre-Consumer	23.7%
Steel Scrap, Post-Consumer	55.4%

1.5. Declaration of Methodological Framework

This LCA uses an attributional approach.

1.6. Manufacturing

Conduit is manufactured by cold-forming (electric-resistance welding, ERW) steel coil into conduit. 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 to create a tube. After welding, the electrical metallic tubing is painted on the inside, galvanized in-line, stenciled, cut to length, labeled, faced, and painted at the end to protect from rust.

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.

1.7. Packaging

The product is packaged with steel banding and shipped using wood dunnage and plastic film, when applicable. Packaging per product is declared in Table 2.

Table 2. Packaging, per Declared Unit

PACKAGING	PRODUCT FROM ROCHELLE, IL	UNIT
LDPE Film	1.91E-06	kg
Steel Banding	2.81E-03	kg
Wood Dunnage	1.09E-02	kg
Biogenic Carbon Content of Packaging, Wood	0.477	kg C/kg

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 the product per declared unit.

ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL— Average Steel EAF Supply Mix

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Table 3. Packaging Waste Details for A5 Scenario Development, per Declared Unit

PACKAGING WASTE	PRODUCT FROM ROCHELLE, IL	UNIT
Plastic Packaging Waste to Landfill	1.44E-06	kg
Plastic Packaging Waste to Incineration	2.86E-07	kg
Plastic Packaging Waste to Recycling	1.81E-07	kg
Steel Packaging Waste to Landfill	9.54E-04	kg
Steel Packaging Waste to Incineration	2.53E-04	kg
Steel Packaging Waste to Recycling	1.60E-03	kg
Wood Packaging Waste to Landfill	3.10E-03	kg
Wood Packaging Waste to Incineration	7.53E-04	kg
Wood Packaging Waste to Recycling	7.06E-03	kg
GWP Based in Biogenic Carbon Content of Packaging, Wood	1.91E-02	kg CO2e

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. Primary data for backhauls are not available, so any short-haul supplier transport distances (<200 miles, or 322 km) are multiplied by 2 to model impacts related to backhauls per Smart EPD's Part B PCR for designated steel construction products.

1.9. 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, 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.

1.10. Disposal

At end of life, steel conduit can be removed from the ground or construction works and recycled or landfilled. According to the PCR Part B for conduit, 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 at a specified diameter and wall thickness. For the

ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE

Electrical Metallic Tubing

Rochelle, IL— Average Steel EAF Supply Mix

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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 the tables below in SI units and optional units.

Table 4. Declared Unit Details, SI Units

NAME	VALUE	UNIT
Declared Unit	1	meter length
Density	7,850	kg/m ³
Outer Diameter	5.59E-02	m
Inner Diameter	5.26E-02	m
Wall Thickness	1.65E-03	m
Mass per declared unit	2.21	kg/m

Table 5. Declared Unit Details, Optional Units

NAME	VALUE	UNIT
Declared Unit	10	ft length
Density	490	lbs/ft ³
Outer Diameter	2.20	in
Inner Diameter	2.07	in
Wall Thickness	0.0650	in
Mass per declared unit	14.8	lbs/10 ft

2.2. System Boundary

The declared system boundary is cradle-to-gate with end of life (A1-A3, C1-C4, D). Because these products are made of steel, cradle-to-gate modules (A1-A3) in this LCA follow the guidance from the Smart EPD Part B PCR for Designated Steel Construction Products (Smart EPD, 2025) system boundary option 2 for manufactured products, shown in Figure 1 and Table 9. The main LCA results represent manufactured product (i.e., unfabricated product), with impacts from fabrication reported separately. More details on fabrication can be found in section 6.4.

ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
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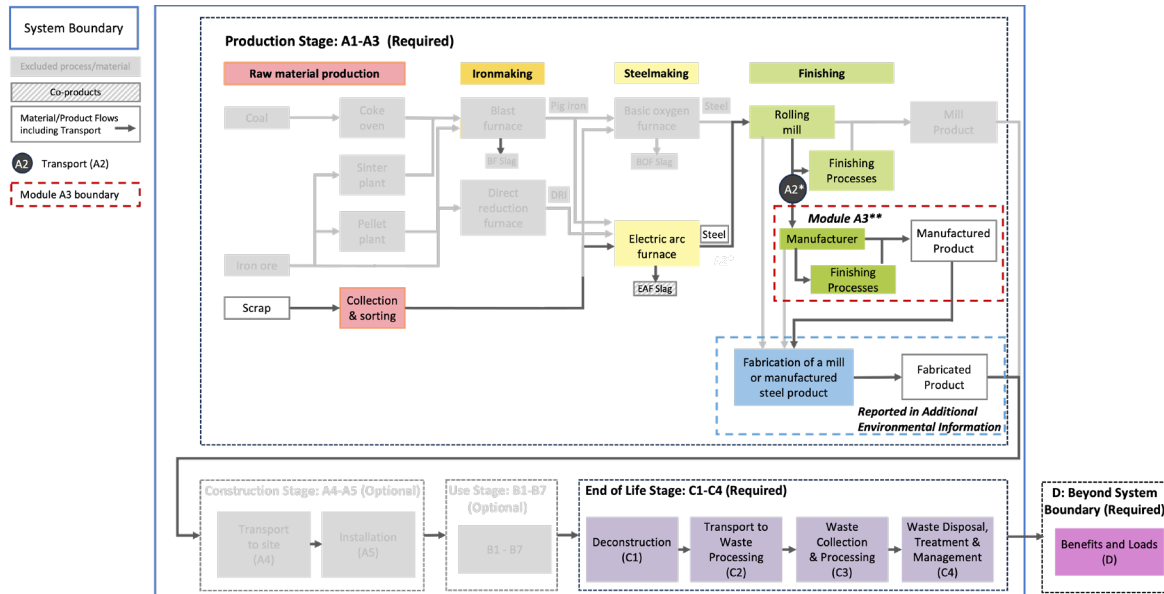


Figure 1: System Boundary Diagram

In primary data collected from the manufacturer, impacts from infrastructure and capital goods are excluded per guidance in the Part B PCR for conduit. 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.

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, 2026).

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 results over multiple mills. The site-weighted average results are used in this LCA's results since they are the best data available.
- Supplier EPDs report LCIA impacts for GWP using IPCC AR5. The influence of different GWP methods for steel coil production is expected to be minimal, so use of GWP results reported on supplier EPDs is deemed justified.
- Supplier EPDs report LCIA impacts other than GWP using TRACI 2.1. For consistency in LCIA methods, AP and EP results per declared unit from the AISI industry average dataset for hot rolled coil in North America (AISI, 2020).
- 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.



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

According to ISO 14025
and ISO 21930:2017

- 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 2025, defined as October 2024 to September 2025. The Rochelle campus contains an East and West building that produce different products. EMT is made at Rochelle East. Data for key inputs and outputs (raw materials, energy, products, and steel scrap) are provided separately for the East and West buildings for the reference period. Data for propane, diesel, water, process materials, packaging materials, and non-steel wastes represent data for calendar year 2025 but were deemed to be sufficiently representative of the reference period.

Whenever available, supplier EPDs were utilized for raw materials of steel coil purchased by the manufacturer.

Secondary data for manufacturing energy and materials were sourced from Sphera Managed LCA Content (fka GaBi) Database 2026.1.

Per the PCR Part A, the data sources for key processes are disclosed below.

Table 6. Details on Datasets with Significant Contribution

CATEGORY	MODULE	MATERIAL/PROCESS NAME	DATASET NAME	DATASET GEOGRAPHY	DATASET REFERENCE YEAR
Material	A1	Hot-rolled steel coil	Supplier EPD	US	2021
Material	A1	Hot-rolled steel coil	Supplier EPD	US	July 2019-June 2020

2.6. Data Quality

Geographical Coverage

The geographical scope of the manufacturing portion of the life cycle is North America. All primary data were collected from the manufacturer. The geographic coverage of primary data is given a score of 1.





WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

According to ISO 14025
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Supplier EPDs utilized are facility-specific and geographic coverage of these data is given a score of 1.

Geographical coverage of secondary datasets from MLC is detailed in the background LCA report and given a score of 2.

Time Coverage

The primary data provided by the manufacturer represents all information for October 2024 to September 2025 and meets Part B PCR requirements that primary data be 3 years old or less at the time of publication. At Rochelle East, data for propane, diesel, process materials, paint, packaging materials, and non-steel wastes represent data for calendar year 2025 but were deemed to be sufficiently representative of the reference period. Time coverage of these data is given a score of 2.

Supplier EPDs utilized have time coverage ranging from 2019-2024. All EPDs are valid at time of this LCA study and meet the requirement of the PCR that all data be updated within a 10-year period and producer-specific foreground data be updated within the last 5 years. Time coverage of EPDs is given a score of 2.

Time coverage of MLC datasets is detailed in the background LCA report. Overall time coverage of the datasets is considered given a score of 1 and meets the requirement of the PCR that all data be updated within a 10-year period.

Technological Coverage

Primary data provided by the manufacturer are specific to technology used in manufacturing their product. They are site-specific and given a score of 1. It is worth noting that the electricity, water, and thermal energy used in product manufacturing includes overhead energy such as lighting and heating. Sub-metering would improve the technological coverage of data quality.

Supplier EPDs for steel coil represent technology specific to the suppliers and technological coverage of these data is given a score of 1.

Data necessary to model cradle-to-gate unit processes were sourced from Sphera Managed LCA Content (fka GaBi) datasets and critically reviewed LCAs. Technological coverage of the datasets is given a score of 2 relative to the actual supply chain of the manufacturer. While broader availability of life cycle data from suppliers would improve technological coverage, the use of lower-quality generic datasets for some portion of raw material supply does meet the goal of this LCA.

2.7. Period under Review

Period under review is the manufacturer's 2025 fiscal year, defined as October 2024 to September 2025.

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 Rochelle, data for key inputs and outputs (raw materials, energy, products, and steel scrap) are provided separately for the East and West buildings and allocated to products by mass from the specific building. Other inputs and outputs of propane, diesel, water, packaging, and non-steel wastes represent annual data as an aggregate between the East and West buildings, and are allocated to products based on total production mass of the East and West buildings. A sensitivity analysis found the results were not sensitive to this choice.

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



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

According to ISO 14025
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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.

3. Life Cycle Assessment Scenarios

Table 7. End of Life (C1-C4) Scenarios, per Declared Unit

NAME		VALUE	UNIT
Demolition (Module C1)		0	kWh
Transport (Module C2)		100	km
Collection Process (Module C3)	Collected Separately	0	kg
	Collected with Mixed Construction Waste	2.21	kg
Recovery (Module C3)	Reuse	0	kg
	Recycling	0	kg
	Landfill (default)	2.21	kg
	Incineration	0	kg
	Incineration with Energy Recovery	0	kg
	Energy Conversion	-	
Disposal (Module C4)	Final Disposal (Landfill Default)		kg
Removals of Biogenic Carbon (excluding packaging)		0	kg CO ₂

Even though the PCR Part B for conduit requires an assumption of 100% landfill for end-of-life (C1-C4), Wheatland Tube believes that steel conduit 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 8. Reuse, Recovery, and/or Recycling (D) Scenarios, per Declared Unit

NAME	PRODUCT FROM ROCHELLE, IL	UNIT
Recycling Rate of Manufacturing Scrap*	100	%
Recycled Content of Product (Plant Average)	58	%
Net energy benefit from energy recovery from waste treatment declared as exported energy in C3	0	MJ
Net energy benefit from thermal energy due to treatment of waste declared as exported energy in C4	0	MJ
Net energy benefit from material flow declared in C3 for energy recovery	0	MJ
Process and conversion efficiencies	N/A	N/A

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



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
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Rochelle, IL– Average Steel EAF Supply Mix

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4. Life Cycle Assessment Results

Table 9. Description of the system boundary modules

PRODUCT STAGE			CONSTRUCT- ION 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/Inst all	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	X	X	X	X	X

X=module is declared, MND=module not declared

4.1. Life Cycle Assessment Results –Electrical Metallic Tubing, Rochelle, IL (Average EAF Steel Supply Mix)

LCIA results are relative expressions and do not predict impacts on category endpoints, the exceeding of thresholds, safety margins or risks.

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.

Because these products are made of steel, cradle-to-gate (A1-A3) GWP-total results are additionally reported per unit mass to support downstream users of the EPD, equal to **1.45 kg CO₂ eq/kg**.

Table 10. North American Impact Assessment Results: 1 meter length of Electrical Metallic Tubing (EMT), Rochelle, IL (Average EAF Steel Supply Mix)

IPCC AR6, TRACI 2.2	UNIT	A1	A2	A3	C1	C2	C3	C4	D
GWP-total	kg CO ₂ eq	2.67E+00	7.14E-02	4.68E-01	0.00E+00	1.86E-02	0.00E+00	4.78E-02	-2.10E-01
GWP-fossil	kg CO ₂ eq	2.67E+00	7.10E-02	4.80E-01	0.00E+00	1.85E-02	0.00E+00	4.78E-02	-2.10E-01
GWP-biogenic	kg CO ₂ eq	-1.17E-03	3.97E-04	-1.26E-02	0.00E+00	9.89E-05	0.00E+00	-3.69E-05	2.26E-04
GWP-luluc	kg CO ₂ eq	5.50E-04	2.07E-05	1.66E-04	0.00E+00	5.48E-06	0.00E+00	2.02E-05	-9.50E-05
ODP	kg CFC11 eq	4.36E-08	2.47E-14	8.59E-13	0.00E+00	6.44E-15	0.00E+00	2.53E-13	-7.82E-13
AP	kg SO ₂ eq	1.09E-02	3.09E-04	4.54E-04	0.00E+00	5.07E-05	0.00E+00	2.47E-04	-1.19E-03
EP, freshwater	kg P eq	3.04E-05	4.55E-08	4.24E-07	0.00E+00	1.21E-08	0.00E+00	1.59E-08	-1.09E-07



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
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IPCC AR6, TRACI 2.2	UNIT	A1	A2	A3	C1	C2	C3	C4	D
EP, marine	kg N eq	3.78E-03	2.65E-04	2.43E-04	0.00E+00	4.58E-05	0.00E+00	1.23E-04	-2.75E-04
POFP	kg O ₃ eq	1.61E-01	8.06E-03	9.09E-03	0.00E+00	1.14E-03	0.00E+00	4.43E-03	-9.79E-03

Table 11. Carbon Emission and Removals, Resource Use, Waste, and Output Flows: 1 meter length of Electrical Metallic Tubing (EMT), Rochelle, IL (Average EAF Steel Supply Mix)

PARAMETER	UNIT	A1	A2	A3	C1	C2	C3	C4	D
Carbon Emissions and Removals									
BCRP	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BCEP	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BCRK	kg CO ₂	0.00E+00	0.00E+00	1.91E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BCEK	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BCEW	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CCE	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CCR	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CWNR	kg CO ₂	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Resource Use Parameters									
RPRE	MJ (LHV)	2.59E+00	3.59E-02	1.03E+00	0.00E+00	9.49E-03	0.00E+00	1.09E-01	-6.60E-01
RPRM	MJ (LHV)	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RPRT	MJ (LHV)	2.59E+00	3.59E-02	1.03E+00	0.00E+00	9.49E-03	0.00E+00	1.09E-01	-6.60E-01
NRPRE	MJ (LHV)	3.71E+01	9.04E-01	8.27E+00	0.00E+00	2.35E-01	0.00E+00	7.14E-01	-2.48E+00
NRPRM	MJ (LHV)	1.26E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NRPRT	MJ (LHV)	3.84E+01	9.04E-01	8.27E+00	0.00E+00	2.35E-01	0.00E+00	7.14E-01	-2.48E+00
SM	kg	1.62E+00	0.00E+00	7.47E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RSF	MJ (LHV)	2.90E-06	0.00E+00	0.00E+00	0.00E+00	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	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RE	MJ (LHV)	2.52E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
ADP _f	MJ (LHV)	7.37E+00	8.97E-01	6.28E+00	0.00E+00	2.33E-01	0.00E+00	6.98E-01	-2.23E+00
FW	m ³	4.94E-02	2.77E-05	2.62E-03	0.00E+00	7.30E-06	0.00E+00	7.74E-05	-9.46E-03
Waste Parameters and Output Flows									
HWD	kg	3.07E-02	1.89E-10	9.13E-03	0.00E+00	4.93E-11	0.00E+00	1.97E-10	-4.81E-09
NHWD	kg	3.17E-01	1.05E-04	1.07E-02	0.00E+00	2.76E-05	0.00E+00	4.42E+00	-3.81E-02
HLRW	kg	7.21E-06	3.27E-09	8.45E-07	0.00E+00	8.53E-10	0.00E+00	6.86E-09	-9.61E-08
ILLRW	kg	1.24E-03	2.75E-06	7.06E-04	0.00E+00	7.16E-07	0.00E+00	5.91E-06	-9.65E-05
CRU	kg	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
MR	kg	1.22E+00	0.00E+00	2.20E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00



ENVIRONMENTAL PRODUCT DECLARATION



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

According to ISO 14025
and ISO 21930:2017

MER	kg	5.53E-08	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EEE	MJ (LHV)	1.33E-04	0.00E+00	1.80E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EET	MJ (LHV)	0.00E+00	0.00E+00	3.36E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

5. Life Cycle Assessment Interpretation

For all the impact categories and products included in this EPD, raw materials (A1) has the highest contribution to cradle-to-gate impacts. Production (A3) is also significant, depending on the indicator. Transportation of raw materials (A2) and is not significant to any indicator.

Across all impact categories for life cycle results, the end of life stage (C1-C4) contributes minimally to environmental impacts. Benefits and loads beyond the system boundary (D) are driven by steel and zinc scrap generated in production and sent to recycling.

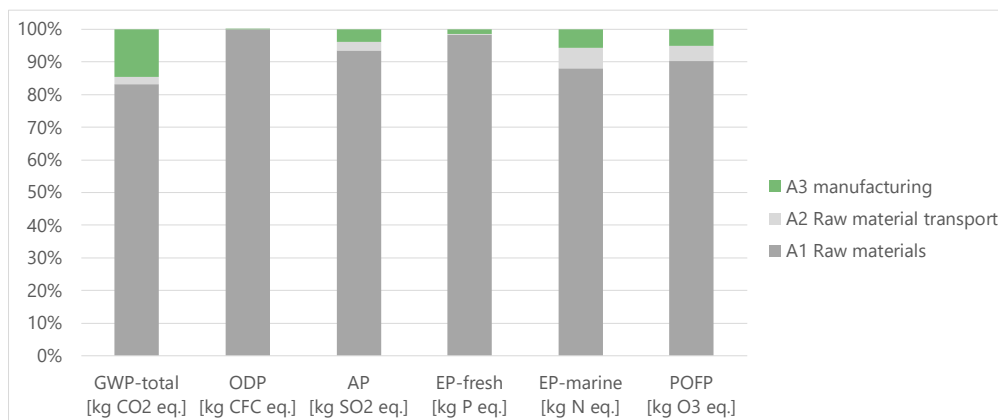


Figure 2: Cradle-to-Gate Impacts for Electrical Metallic Tubing, Rochelle, IL (Average EAF Steel Supply Mix)

6. Additional Environmental Information

6.1. Environment and Health During Manufacturing

Wheatland Tube maintains a safety datasheet (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 defines recommended handling and regulatory exposure limits and recommended control measures.

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: When possible, Wheatland Tube opts for waste management avenues that either reclaim energy or divert from landfill disposal. Most byproducts from the galvanizing process are captured and reintroduced onsite, while others are sold as a raw material to third parties. Scrap steel and secondary material is sent for offsite recycling. These choices conserve natural resources, reduce energy consumption and greenhouse gas emissions, and keep valuable



WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL– Average Steel EAF Supply Mix

According to ISO 14025
and ISO 21930:2017

materials in circulation.

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.

6.3. Regulated Hazardous Substances

No substances required to be reported as hazardous per the EPA's Resource Conservation and Recovery Act (RCRA) are in the material content of the finished product.

6.4. Impacts Associated with Fabrication

Because these conduit products are made of steel, this LCA follows guidance from Smart EPD's PCR Part B for designated steel construction products for reporting impacts from fabrication separately from the main LCA results for manufactured product, i.e., system boundary option 2. The following table contains cradle-to-gate results related to fabrication that are not part of the underlying LCA, LCI and additional module-based data for this product. Fabrication impacts are based on published industry-averages from AISC available at the time of the publication of this EPD (AISC, 2025).

For fabricated product, the system boundary is defined as:

- A1: environmental impacts from Wheatland production of unfabricated product (A1-A3). To produce 1 metric ton of fabricated product, 1.0771 metric tons of Wheatland's unfabricated product are required, per AISC.
- A2: environmental impacts from transportation from Wheatland's manufacturing facility to the fabrication facility, per AISC.
- A3: environmental impacts from fabrication processes, per AISC.

Note that in the AISC EPD, potential eutrophication impacts are reported as EP, without separate indicators for freshwater or marine eutrophication. Because the results are per TRACI 2.2 methodology and in units of kg N-eq, it is assumed these impacts are EP-marine. Thus, EP-fresh impacts are not reported and omitted from fabrication results in this LCA.

LCA results associated with fabrication are declared in the table below.

Table 12. North American Impact Assessment Results: 1 meter length of Fabricated Electrical Metallic Tubing (EMT), Rochelle, IL (Average EAF Steel Supply Mix)

IPCC AR6, TRACI 2.2	UNIT	A1	A2	A3
GWP-total	kg CO ₂ eq	3.46E+00	5.79E-02	1.82E-01
GWP-fossil	kg CO ₂ eq	3.47E+00	5.79E-02	1.82E-01
GWP-biogenic	kg CO ₂ eq	-1.44E-02	4.09E-06	9.44E-05
GWP-luluc	kg CO ₂ eq	7.93E-04	3.78E-06	1.21E-04
ODP	kg CFC11 eq	4.70E-08	1.20E-09	1.71E-09
AP	kg SO ₂ eq	1.26E-02	2.19E-04	4.75E-04
EP, marine	kg N eq	4.61E-03	2.50E-04	2.39E-04
POFP	kg O ₃ eq	1.92E-01	6.12E-03	5.97E-03





WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL— Average Steel EAF Supply Mix

According to ISO 14025
and ISO 21930:2017

7. References

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WHEATLAND TUBE
Electrical Metallic Tubing
Rochelle, IL— Average Steel EAF Supply Mix

According to ISO 14025
and ISO 21930:2017

8. Impact Scaling Factors

For each product, results are provided for 1 m length of conduit 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 PCR Part B for conduit section 5.3.3.

The conduit impacts are equal to the conduit 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 3" diameter Electrical Metallic Tubing produced at Rochelle, GWP of 2" diameter conduit (3.21) is multiplied by the scaling factor *per m* for 3" size (1.73). This calculation is equal to 5.55 kg CO₂ eq/m conduit with 3" diameter.

Similarly, to find the cradle-to-gate GWP of 10 ft of 2" diameter Electrical Metallic Tubing produced at Rochelle, GWP of 2" diameter conduit (3.21) is multiplied by the scaling factor *per 10 ft* for 2" size (3.05). This calculation is equal to 9.79 kg CO₂ eq/10 ft conduit with 2" diameter.

Table 13. Impact Scaling Factors

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	1.79E-02	1.58E-02	1.07E-03	4.44E-01	2.01E-01	6.13E-01
3/4	2.34E-02	2.09E-02	1.24E-03	6.81E-01	3.08E-01	9.40E-01
1	2.95E-02	2.67E-02	1.40E-03	9.67E-01	4.38E-01	1.33E+00
1 1/4	3.84E-02	3.51E-02	1.65E-03	1.49E+00	6.77E-01	2.06E+00
1 1/2	4.42E-02	4.09E-02	1.65E-03	1.73E+00	7.85E-01	2.39E+00
2	5.59E-02	5.26E-02	1.65E-03	2.21E+00	1.00E+00	3.05E+00
2 1/2	7.32E-02	6.93E-02	1.91E-03	3.35E+00	1.52E+00	4.62E+00
3	8.89E-02	8.53E-02	1.78E-03	3.82E+00	1.73E+00	5.27E+00
3 1/2	1.02E-01	9.73E-02	2.16E-03	5.29E+00	2.40E+00	7.31E+00
4	1.14E-01	1.10E-01	2.16E-03	5.97E+00	2.70E+00	8.24E+00

