

"Safer Products for a Cleaner Environment"

<https://gsp-usa-inc.com/>

Dear Customer,

January 01, 2026

This Environmental Compliance Certification (ECC) is provided in support of **Texas Commission on Environmental Quality (TCEQ)** air permitting and regulatory review, and for consistency with applicable **U.S. Environmental Protection Agency (EPA)** requirements.

Manufacturer:

Global Specialty Products-USA, Inc. Mount Holly, New Jersey, USA

Product Identification:

W400590 – SURF A LUBE™ Equipment Storage Fluid

Regulatory Compliance Statement:

Global Specialty Products-USA, Inc. certifies that **SURF A LUBE™** is manufactured in the United States and, to the best of our knowledge and based on ingredients - formulation review, **does not contain regulated constituents that would trigger air permitting, reporting, or hazardous classification requirements** under the following programs:

- **Clean Air Act (CAA), Section 112(b):**
Product contains **no Hazardous Air Pollutants (HAPs)** as listed by the U.S. EPA.
- **Volatile Organic Compounds (VOC):**
All ingredients are **VOC-exempt as defined under 40 CFR §51.100(s)**.
The product is considered **low-emitting for air permitting purposes**.
- **Ozone-Depleting Substances:**
Product contains **no Class I or Class II Ozone-Depleting Substances** as defined under **40 CFR Part 82**.
- **RCRA (40 CFR Parts 260–273):**
No listed or characteristic hazardous wastes are added as ingredients.
No RCRA metals are intentionally added to the formulation.
- **SARA Title III, Section 313 (EPCRA):**
Product does **not contain reportable toxic chemicals** subject to TRI reporting.
- **California Proposition 65:**
Product does **not contain chemicals listed as carcinogens or reproductive toxins**.
- **REACH (EC 1907/2006):**
Product does **not contain substances listed on REACH Annex XIV or restricted Annex XVII**.

- **Additional International & Restricted Substance Lists:**
 - PRSL (Prohibited and Restricted Substances List)
 - Canada SOR/2012-285 (Prohibition of Certain Toxic Substances Regulations)
 - NPIR 2011
 - German Consumer Goods Ordinance

Excluded Chemical Classes:

SURF A LUBE™ is certified **not to contain** the following substances or chemical families, which are commonly reviewed during TCEQ and EPA air evaluations:

- N-Methyl-2-Pyrrolidone (NMP) or Gamma-Butyrolactone
- Aromatic or aliphatic petroleum hydrocarbons, including benzene and mineral spirits
- Alcohols such as methanol
- Ketones (acetone, MEK, MIBK) or PM acetate
- Chlorinated solvents (methylene chloride, 1,1,1-TCE, PERC, etc.)
- Phenol, tricresyl phosphate isomers
- Butoxyethanol and related glycol ethers
- Phthalates, including DPHP and DOP

Physical & Environmental Characteristics:

SURF A LUBE™ is a proprietary blend of solvents and wetting agents exhibiting the following attributes relevant to air permitting and environmental review:

- VOC-exempt formulation
- Low vapor pressure – High boiling point
- Non-flammable and non-combustible
- Non-reactive
- Non-corrosive
- Mild odor
- Low acute toxicity
- Not classified as hazardous under OSHA HCS
- Recyclable via vacuum distillation
- Compatible with ferrous and non-ferrous metals

Supporting Documentation:

This certification is supported by the product **Safety Data Sheet (SDS)** and formulation review data maintained by Global Specialty Products-USA, Inc. Documentation is available upon request for regulatory review.

If additional clarification is required for **TCEQ air permit applications, OP-UA forms, PBR determinations, or EPA compliance reviews**, please contact me directly.

Thank you and Kind Regards,

David Faghani, Ch.E.; M. Sc.
Technical Managing Director

Global Specialty Products USA, Inc.

www.gsp-usa-inc.com

10 Eagle Avenue – Suite 500 - Mount Holly, NJ 08060
Phone: 609-518-7577 (1-877-GSP-USA0) Fax: 609-518-5277



This email and any attachments are only for use by the intended recipient(s) and may contain legally privileged, confidential, proprietary or otherwise private information. Any unauthorized use, reproduction, dissemination, distribution or other disclosure of the contents of this e-mail or its attachments is strictly prohibited. If you have received this email in error or you wish to remove your email from our database, please notify the sender immediately and delete the original.