

January 13, 2012

## COMPLIANCE OF ITW INSULATION SYSTEMS' PRODUCTS TO SECTION 1605 OF THE ARRA

Section 1605, called the "Buy American Clause", of the 2009 American Recovery and Reinvestment Act (ARRA) requires use of "American manufactured goods" for projects funded by the ARRA.

ITW certifies that the ITW Insulation Systems products listed below purchased from ITW after<sup>1</sup> January 1, 2008 comply with Section 1605 (buy American clause) of the ARRA.

- All Trymer\* Polyisocyanurate Insulation
- All Trymer\* Green Phenolic Insulation
- All XPS Pipe Insulation Billet
- All Saran™ and Saran™ CX Vapor Retarder Film and Tape
- All pressed metal elbows and fittings
- All 48" wide aluminum jacketing
- All white, clear, and gray painted aluminum
- All metal jacketing accessory products and tools with the exception of banding, screws, tie wire, and hex mesh wire

### Additional information related to some ITW products not compliant to the ARRA

The decision to NOT certify our aluminum and stainless steel deep corrugated sheets, aluminum and stainless steel box rib sheets, 36" wide unpainted aluminum jacketing and 36" wide stainless steel jacketing as compliant with the "buy American clause" of the ARRA was a difficult one. While ITW does normally buy the raw material (coils of aluminum/stainless steel metal) for these products from overseas, we subject this metal to a number of operations in our Houston, TX facility including unwinding, cleaning, heating, laminating, with polysurlyn, cooling embossing, cutting, and shaping. The ARRA gives some guidance as to what degree of manipulation of raw materials allows categorizing the resulting product as, "Made in America." Specifically, the foreign raw materials must undergo a, "substantial transformation." Since we believe that laminated metal jacketing falls into a gray area on this, ITW has chosen to exhibit an abundance of caution and not certify these products to section 1605 of the ARRA.

Upon special request ITW can supply ARRA compliant aluminum and stainless steel deep corrugated sheets, aluminum and stainless steel box rib sheets, 36" wide unpainted aluminum jacketing, banding, and 36" wide stainless steel jacketing but this might require increased lead times and a minimum volume commitment since ITW might have to specially procure the aluminum/stainless steel coils or banding from a domestic source.

If you have any questions, do not hesitate to contact ITW at (800)231-1024

<sup>1</sup> It is also likely that these products purchased from ITW prior to 1/1/2008 are ARRA compliant. To determine this, contact ITW.

\*Trademark of ITW Insulation Systems

™Trademark of The Dow Chemical Co.

### Manufacturing Address:

METAL Products - 1304 E. 40<sup>th</sup> Street – Houston, TX 77022

TRYMER PIR Products - 550 Independence Pkwy S. - La Porte, TX 77571

TRYMER Green Products – 6430A Antoine – Houston, TX 77091

Saran and XPS PIB Products - 2030 Dow Ctr Rd - Midland, MI, 48674