

# COMUS



*Sensing the world's needs*

Date: June 16, 2020

**Memorandum of Non-Applicability  
For immediate release**

Re: California Prop 65

To all customers,

As a supplier of mercury-based products, Comus has developed and maintained the highest safety standards. The company has and will continue to take all steps necessary to create products that are effective and safe for their intended use. In accordance with this internal standard, Comus produces items that do not require warnings because simply put they do not create exposure by their very nature.

Prop 65 requires that “Businesses are required to provide a "clear and reasonable" warning before knowingly and intentionally exposing anyone to a listed chemical, unless the business can show that the anticipated exposure level will not pose a significant risk of cancer or is significantly below levels observed to cause birth defects or other reproductive harm.” It is Comus’ position that our products do not expose people to chemicals for the following reason:

“All Comus products that may or may not contain compounds in relation to California Proposition 65 are hermetically sealed. Hermetic seal performance for vacuum or pressure applications is defined by a leak rate specification. Using any of the various test methods on an epoxy seal will show virtually no detectable leak. The most widely accepted leak test is a helium test with a calibrated leak rate. Most commercial grade glass or ceramic seals have leak rates of less than  $1 \times 10^{-5}$  SCC/S at one atmosphere differential. Epoxy seals have leak rates typically between  $10^{-7}$  and  $10^{-10}$  SCC/S. Comus products have a leak rate defined as  $10^{-8}$  at one atmosphere.”

Accordingly, the process of hermetically sealing the product virtually eliminates the risk of exposure, and therefore, would not subject Comus to the Prop 65 rules.

These statements are made not as a warranty, but merely an internal generated report as it relates to Prop 65 applicability. All statements are subject to and conditioned upon proper use and handling of the products in question for their given purpose as indicated by the inherent engineering crafted through the manufacturing process. Improper use and mishandling would be outside the scope of these statements. These statements are subject to change in the event of changes made to Prop 65 and are only made in consideration of the current landscape of requirements as espoused by the California legislature as it relates to the protections they deemed to be required for chemicals and exposure to chemicals in the confines of their State.