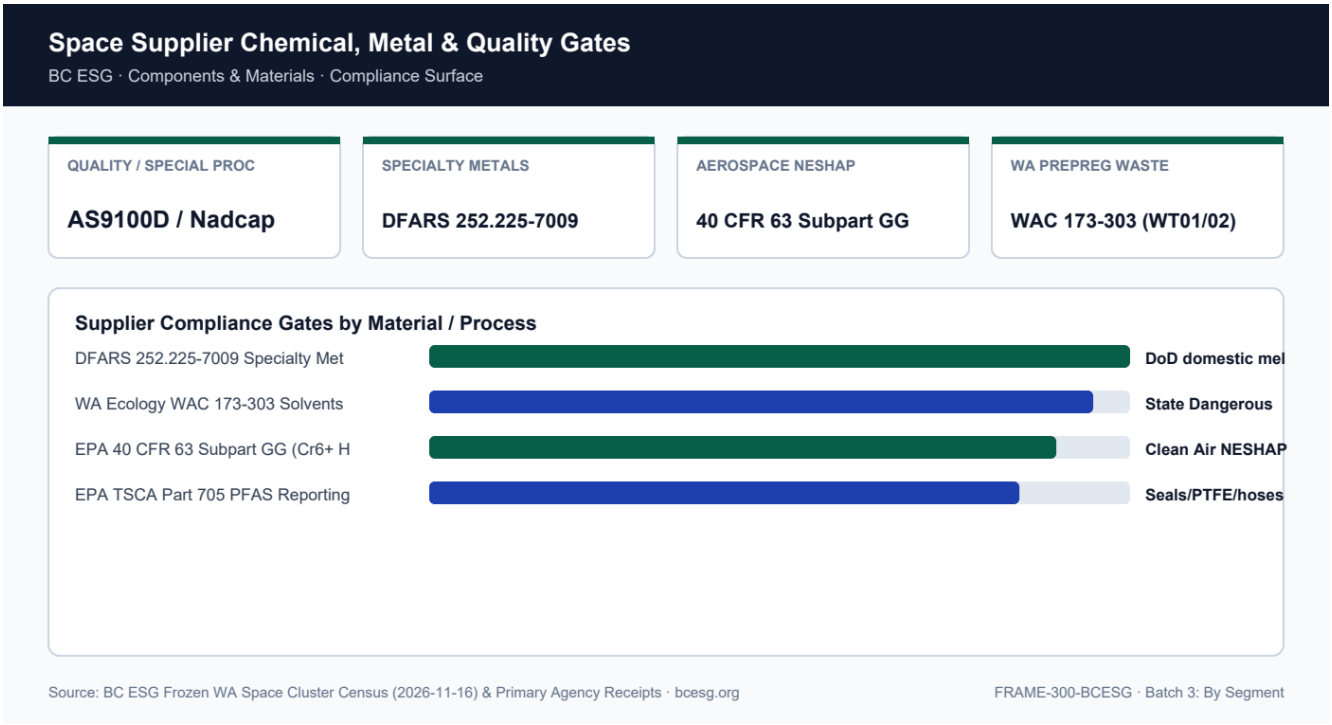
Supplier Compliance: AS9100D, Nadcap, DFARS Specialty Metals & TSCA PFAS

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https://bcesg.org/wa-space-components-materials-disclosure-compliance/

Verification & Scope Baseline: Binding flow-downs & environmental rules: DFARS 252.225-7009 specialty metals, EPA NESHAP Subpart GG (Cr6+/VOC), TSCA PFAS Part 705, and WA WAC 173-303 prepreg/solvent waste.



Mandate	Citation	Shop-Floor Trigger	Requirement
AS9100D & Nadcap	SAE AS9100D / PRI Nadcap	Machining, NDT, plating, composites	QMS & special-process accreditation
DFARS Specialty Metals	48 CFR § 252.225-7009	Titanium, Inconel, alloy steels	US/qualifying-country melt (<=2% min rule)
Aerospace NESHAP	40 CFR Part 63 Subpart GG	Cr6+ primers, cadmium, VOC coatings	HEPA/3-stage filters & shift pressure logs
TSCA PFAS & WA Waste	40 CFR Part 705; WAC 173-303	PTFE/seals; MEK/acetone; prepreg	PFAS reporting; F-listed & WT01/02 manifests

Where Supplier ESG & Compliance Actually Bites on the Shop Floor

Tier-2 space suppliers face concrete material-level compliance: **AS9100D** quality systems and **Nadcap** special-process accreditations (chemical processing AC7108, NDT AC7114, composites AC7118), plus **DFARS 252.225-7009** (10 U.S.C. § 4863), which mandates domestic or qualifying-country melting for titanium, specialty steels, and nickel/cobalt alloys.

On the environmental side, **EPA 40 CFR Part 63 Subpart GG** mandates HEPA or 3-stage dry particulate filtration for hexavalent chromium primers; **EPA TSCA 40 CFR Part 705** requires retroactive reporting on imported/manufactured

PFAS articles (seals, PTFE wire, hoses); and **Washington WAC 173-303** regulates spent cleaning solvents (F001–F005) and uncured composite prepreg scrap as State-only Dangerous Waste requiring exothermic-safe drum vents.

Verified Primary Sources & Internal Bridges

• eCFR DFARS 252.225-7009: https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252/subpart-252.2/section-252.225-7009

• eCFR 40 CFR 63 Subpart GG: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-63/subpart-GG

• eCFR 40 CFR Part 705 (PFAS): https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-705

• WA Legislature WAC 173-303: https://apps.leg.wa.gov/wac/default.aspx?cite=173-303

• SAE AS9100D: https://www.sae.org/standards/content/as9100d/

• PRI Nadcap: https://p-r-i.org/nadcap/