

LAW OFFICES OF BRIAN GAFFNEY
605 Market Street, Suite 505, San Francisco, CA 94105
(415) 442- 0711 Phone (415) 442-0713 Fax

June 28, 2006

By Certified Mail, Return Receipt Requested to Violators
By First Class U.S. Mail to Public Enforcement Agencies

Dear Public Enforcement Agencies / Violators:

This office and As You Sow ("AYS") gives you notice that, since at least June 28, 2003, the businesses listed on Attachment A have been, and continue to be, in violation of California Health & Safety Code §25249.6. AYS is a private enforcer of Proposition 65 which may be contacted at the above listed address and telephone number, and I am a responsible individual with both AYS and this office.

The above referenced violations occur when California residents spray and/or inhale cleaning products ("Cleaners" or "products"), which contain Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and/or Toluene at levels above the stated Proposition 65 limits¹. Examples of particular Cleaners manufactured, sold, distributed and/or marketed by the violators are attached as Attachment B.

When people inhale, spray or otherwise use these Cleaners (*i.e.*, when they use the Cleaners as directed on the packaging), the Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and/or Toluene is inhaled. Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and/or Toluene are inhaled when people spray Cleaners containing Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and/or Toluene in the normal course of use. The Cleaners sold by these businesses thus expose consumers and workers to these chemicals via the inhalation route of exposure. In addition, exposures in the environmental context occur in the homes, businesses and public locations where the Cleaners are used. The environmental exposure for which a warning is required occurs beyond the property owned or controlled by the violators. Exposures to Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and Toluene occur within the consumer, environmental, and occupational contexts. AYS, does not, however, allege occupational exposures as to Cleaners manufactured outside of California, except as to the workplaces that these businesses maintain in California.

The businesses listed on Attachment A do not provide clear and reasonable warnings to people who spray, inhale or use Cleaners, that the Cleaners will expose them to chemicals known to cause cancer and/or birth defects and other reproductive harm.

¹ On April 1, 1988 Methylene Chloride (Dichloromethane) and Perchloroethylene (Tetrachloroethylene) were listed under the statute as chemicals known to the State of California to cause cancer. On January 1, 1991, Toluene was listed under the statute as a chemical known to California to cause birth defects or other reproductive harm.

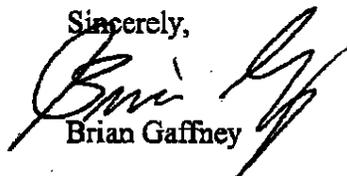
These violations and threatened violations will continue to occur everyday until these businesses either provide clear and reasonable warnings, reformulate their Cleaners so as not to contain Methylene Chloride (Dichloromethane), Perchloroethylene (Tetrachloroethylene) and/or Toluene, or stop selling these Cleaners. These violations occur in all of California's 58 counties, both on and off of these businesses' properties.

As You Sow ("AYS") is a non-profit foundation organized under California's Non-Profit Public Benefit Corporation Law. AYS is dedicated to, among other causes, the protection of the environment, the promotion of human health, the improvement of worker and consumer safety, and environmental education. AYS is located at 311 California Street, Suite 510, San Francisco, CA 94104.

In keeping with its public interest mission and to expeditiously rectify these ongoing violations of California law, AYS is interested in seeking a constructive resolution of this matter without engaging in costly and protracted litigation. Please direct all communications regarding this notice to AYS' counsel in this matter:

Brian Gaffney
LAW OFFICES OF BRIAN GAFFNEY
605 Market Street, Suite 505
San Francisco, CA 94105
(415) 442 - 0711 Phone / (415) 442 - 0713 Fax

Sincerely,



Brian Gaffney

Enclosure to Violators "The Safe Drinking Water and Toxic Enforcement Act of 1986: A Summary"

Attachment A

Industrial Bolt & Supply, Inc.
John T Butcher, President
740 Clay Street NW
Auburn, WA 98001

Industrial Bolt & Supply, Inc.
John T Butcher, President
740 Clay St NW; Po Box 1717
Auburn, WA 98071-1717

Industrial Bolt & Supply, Inc.
John T Butcher, President
320 Third Street S.W.
Auburn, WA 98001-5300

Industrial Bolt of California, Inc.
Gregory Leipman, President
651 Via Alondra, Suite 702
Camarillo, CA 93012

CERTIFICATE OF SERVICE

I, Brian Gaffney, declare:

If so called, I could and would testify as follows: I am over eighteen. My business address is 605 Market St., Suite 505, San Francisco, CA 94105. On June 28, 2006, I caused the attached 60-DAY NOTICE LETTER, to be served by U.S. Mail on those public enforcement agencies listed on the attached SERVICE LIST; in addition on the same date and by Certified Mail I caused the attached 60-DAY NOTICE LETTER and PROPOSITION 65: A SUMMARY to be sent by Certified Mail to the private business entities also listed on the attached SERVICE LIST. I deposited copies of these documents in envelopes, postage pre-paid, with the U.S. Postal Service on the day on which the mail is collected. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on June 28, 2006, at San Francisco, California.


 Brian Gaffney

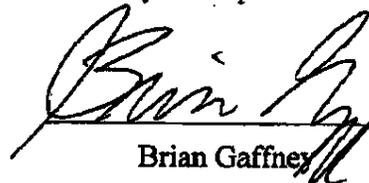
This notice alleges the violation of Proposition 65 with respect to occupational exposures governed by the California State Plan for Occupational Safety and Health. The State Plan incorporated the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval specifically placed certain conditions on Proposition 65, including that it does not apply to the conduct of manufacturers occurring outside the State of California. The approval also provides that an employer may use the means of compliance in the general hazard communication requirements to comply with Proposition 65. It also requires that supplemental enforcement is subject to the supervision of the California Occupational Safety and Health Administration. Accordingly, any settlement, civil complaint, or substantive court orders in this matter must be submitted to the Attorney General.

CERTIFICATE OF MERIT

Health and Safety Code Section 25249.7(d)

I, Brian Gaffney, hereby declare: This Certificate of Merit accompanies the attached sixty-day notice(s) in which it is alleged the parties identified in the notices have violated Health and Safety Code section 25249.6 by failing to provide clear and reasonable warnings. I am the attorney for the noticing party. I have consulted with one or more persons with relevant and appropriate experience or expertise who has reviewed facts, studies, or other data regarding the alleged exposure to the listed chemical that is the subject of the action. Based on the information obtained through those consultations, and on all other information in my possession, I believe there is a reasonable and meritorious case for the private action. I understand that "reasonable and meritorious case for the private action" means that the information provides a credible basis that all elements of the plaintiffs' case can be established and the information did not prove that the alleged violator will be able to establish any of the affirmative defenses set forth in the statute. The copy of this Certificate of Merit served on the Attorney General attaches to it factual information sufficient to establish the basis for this certificate, including the information identified in Health and Safety Code section 25249.7(h)(2), i.e., (1) the identity of the persons consulted with and relied on by the certifier, and (2) the facts, studies, or other data reviewed by those persons.

June 28, 2006


 Brian Gaffney

SERVICE LIST

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OFFICE OF THE ATTORNEY
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OROVILLE, CA 95965

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