



Date: July 1, 2019

Subject: Compliance with California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)

To Whom It May Concern:

In accordance with California EPA's Office of Environmental Health Hazard Assessment (OEHHA), the State of California has published a list of over 900 chemicals, including naturally occurring substances used in manufacturing and processing of products that are known to the State to cause cancer or birth defects or other reproductive harm.

It is the responsibility of the manufacture to review this list and to advise its customers of the potential that their products might contain trace amounts of one or more of these chemicals. Spruce Environmental Technologies, Inc. takes this responsibility seriously and strives to produce products that meet or exceed governmental standards. We continually review our materials of construction and manufacturing processes to ensure compliance with such standards.

As such, Spruce Environmental Technologies, Inc. is providing this letter as acknowledgment that the following chemicals are known to exist in some of the components that are used in the construction of our inline radon fans:

Table 1

| Product Component | Chemical Name | PROP 65 Disclaimer |
|--------------------|--------------------|------------------------------|
| Thread lock | Cumene | Known to cause cancer |
| Insulation Varnish | Ethyl benzene | Known to cause cancer |
| Insulation Varnish | Crystalline Silica | Known to cause cancer |
| Insulation Varnish | Toluene | Known to cause birth defects |
| Metal Coating | Cadmium | Known to cause cancer |
| Metal Coating | Cadmium | Known to cause birth defects |

And according to California Safe Drinking Water and Toxic Enforcement Act of 1986, warning labels are required either on the end product or in place of use and are to be supplied by the companies producing products constructed with chemicals from the list. However, this is only necessary when exposure to a chemical is a given and that exposure is above set limits. If daily exposure to a chemical at a level which does not exceed the set limit of micrograms/day, such chemical shall be deemed to pose no significant risk per the language of the Act.



Spruce Environmental Technologies, Inc.

It is the position of Spruce Environmental Technologies, Inc. that the chemicals listed in Table 1 above do not pose a significant risk based on the following reasons:

- The hazard of the chemicals listed in Table 1 is derived based on inhalation or ingestion. This generally applies to the chemical being in a state prior to use in the manufacturing of product components. (i.e. Cadmium dusts or fumes present during the metal coating process.)
 - Customers are not at risk of inhaling any of the chemicals listed in Table 1 because they are not used in that state when used in the end state
 - Customers are not at risk of ingesting any of the chemicals listed in Table 1 because of the product is not in contact with food or drink and is not intended to ever be in contact
- Due to the construction of our inline radon fans, access to the components that were manufactured with the chemicals listed in Table 1 is extremely limited.
 - Customers are not at risk of any of the chemicals listed in Table 1 because the normal operation of the product is that of a fan that runs constantly. By design, there is no required interaction between the product and the end user/customer

Our inline radon fans are designed to remove radon gas (a carcinogen on its own) from underneath customer's homes. Interaction with the product is limited to a one-time installation through contact with the fan housing which is made of a non-hazardous material. Daily exposure (contact) with the product after this point is uncommon. It is for these reasons, we believe that our radon fan products do not pose a significant risk and therefore, do not require individual labeling.

THE INFORMATION PROVIDED HEREIN IS TRUE AND COMPLETE TO THE BEST OF OUR KNOWLEDGE. ALL INFORMATION IS MADE WITHOUT GUARANTEE ON THE PART OF SPRUCE ENVIRONMENTAL TECHNOLOGIES, INC. AND IS PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE COMPANY DISCLAIMS ANY LIABILITY IN CONNECTION WITH USE OF THIS INFORMATION.

Should you have further questions or comments on this matter, please feel free to contact our Customer Service Department.

Sincerely,

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