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March 23, 2018

Via U.S. Mail

American Airlines Group, Inc.

Mr. Robert D. Isom, Jr.
Corporate Headquarters
P.O. Box 619616
DFW Airport, TX 75261-9616
Robert.isom@aa.com

Envoy Air

Mr. Pedro Fábregas, President
Corporate Headquarters
4301 Regent Boulevard
Irving, TX 75063
Pedro.fabregas@aa.com

Piedmont Airlines

Mr. Lyle Hogg, President
Corporate Headquarters
5443 Airport Terminal Rd.
Salisbury, MD 21804
lyle.hogg@piedmont.com

PSA Airlines

Mr. Dion Flannery, President
Corporate Headquarters
3400 Terminal Dr.
Vandalia, OH 45377
Dion.flannery@psa.com

Aramark Uniform & Career Apparel Group, Inc.

Brad Drummond, CEO
1101 Market St.
Philadelphia, PA 19107

Twin Hill Acquisition Company, Inc. (dba

Twin Hill corporate Apparel)
Stuart Vogt, Principal, Vice President
6380 Rogerdale Road
Houston, TX 77072

Tailored Brands Purchasing, LLC

Laura Ann Smith, Principal
6380 Rogerdale Road
Houston, TX 77072

PVH Corp.

Emanuel Chirico, CEO
200 Madison Avenue
New York, NY 10016

Heritage Brands

Francis K. Duane, CEO
200 Madison Avenue
New York, NY 10016

Dear Addressees:

This firm represents the Association of Flight Attendants-Communications Workers of America (“AFA-CWA”) and Maresa Bache (collectively “Noticing Parties”) in connection with this notice of violations of California’s Safe Drinking Water and Toxic Enforcement Act of 1986, which is codified at California Health & Safety Code section 25249.5 et seq. (“Proposition 65”).

The AFA-CWA is a non-profit labor organization representing flight attendants employed by airlines across the country, including in California. Maresa Bache is a flight attendant and member of the AFA-CWA.

This letter constitutes notice to the addressees that they have violated and continue to violate provisions of Proposition 65. Specifically, the entities to which this letter is addressed (also listed below) have violated and continue to violate the warning requirement at section 25249.6 of the California Health & Safety Code, which provides, “No person in the course of doing business shall knowingly and intentionally expose any individual to a chemical known to the state to cause cancer or reproductive toxicity without first giving clear and reasonable warning to such individual....”

Alleged Violators (“Violators”):

Airline Violators	Additional Violators
American Airlines Group, Inc.	Twin Hill Acquisition Company, Inc. (dba Twin Hill corporate Apparel)
Piedmont Airlines	Aramark Uniform & Career Apparel Group, Inc.
Envoy Air	Tailored Brands Purchasing, LLC
PSA Airlines	PVH Corp.
	Heritage Brands

The airline Violators are noticed for occupational exposures; the remaining Violators are noticed for consumer exposures and, to the extent their conduct occurs in the State of California, for occupational exposures.

Pursuant to California Health & Safety Code section 25249.7, subdivision (d), the Noticing Parties, as defined above, intend to bring an enforcement action against the Violators sixty (60) days after effective service of this notice unless the public enforcement agencies listed in the attached Certificate of Service have commenced and are diligently prosecuting an action to rectify these violations. A summary of Proposition 65 and its implementing regulations, prepared by the Office of Environmental Health Hazard Assessment, the lead agency designated under Proposition 65, is enclosed with the copy of this notice served on the Violators. The specific details of the violations that are the subject of this Notice are provided below.

Description of Violations:

The airline Violators are employers that require flight attendants to wear uniform shirts, pants, and other apparel; the remaining Violators provide these items to consumers, including flight attendants.

- **Time Period of Exposure:** The violations have been occurring since at least September 2016 with regard to Twin Hill uniform apparel and since at least March 21, 2017, with regard to Aramark uniform apparel (including Van Heusen and Eagle-branded articles) and are continuing to this day.

- **Provision of Proposition 65 Implicated:** This Notice of Violation covers the “warning provision” of Proposition 65, which is found at California Health and Safety Code, section 25249.6.
- **Chemical Involved:** The name of the listed chemical involved in these noticed violations is formaldehyde (gas). Exposure to formaldehyde (gas) occurs by inhalation from the wearing, storing, and close contact with the uniform garment pieces identified in this Notice.
- **Types of Products:** The specific types of products causing the violations are various pieces of uniform apparel. These include, but are not limited to, the following listed items and items manufactured of the same material as those listed below:

Identified Brand	Item	Style no.
Twin Hill	Female LS blouse, blue check	460-0191-202
Twin Hill	Serving garment, charcoal	740-0080-204
Twin Hill	Female LS blouse, white	460-0200-202
Van Heusen/Aramark	Women’s LS pinpoint white shirt	6172
Eagle/Aramark	Women’s LS pinpoint white shirt	6173
Twin Hill	Female pant – slim, dark charcoal	320-0145-202
Twin Hill	Female pant – classic, dark charcoal	320-0144-202

- **Description of Exposures:** This Notice addresses consumer and occupational exposures to formaldehyde (gas). Use of the items listed above, as well as other items of the same material, results in human exposures to formaldehyde (gas). Formaldehyde (gas) is released from the garments continuously when they are worn and used in the intended manner over the life and use of the garment. The primary route of exposure for the violations is inhalation while flight attendants are wearing the garment(s). These exposures occur in homes, cars, airports, airplanes and workplaces throughout California where the products are used. No clear and reasonable warning is provided with these products or in the workplace regarding the carcinogenic hazards of wearing the items or specifically of formaldehyde (gas).
- **Notification Regarding Occupational Exposures:** Pursuant to California Code of Regulations, title 27, section 25903 and California Code of Regulations title 8, section 338, subdivision (b), you are informed as follows: 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 incorporates the provisions of Proposition 65, as approved by Federal OSHA on June 6, 1997. This approval

specifically placed certain conditions with regard to occupational exposures 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.

Pursuant to California Code of Regulations, title 11, section 3100, a Certificate of Merit is attached.¹

Resolution of Claims Being Noticed

Based on the allegations set forth in this Notice, the Noticing Parties intend to file a citizen enforcement lawsuit against the Violators unless they agree to remedy the violations set forth above. If the Violators are interested in resolving this dispute without resort to expensive and time-consuming litigation, please contact the Noticing Parties through their counsel identified below.

Preservation of Relevant Evidence

This Notice also serves as a demand that the Violators preserve and maintain all relevant evidence, including all electronic documents and data, pending resolution of this matter. Such relevant evidence includes but is not limited to all documents relating to formaldehyde released from or during the storage, wear, and use of garments identified above; purchases and sales information for such products; communications with any person relating to actual or potential exposures to formaldehyde from the use and wear of such products and garments; and representative exemplars of each unit of any such products sold since September 2016.

Parties

This Notice is provided on behalf of the following person and organization:

AFA-CWA
c/o Ed Gilmartin
501 3rd St. NW
Washington, DC 20001
(202) 434.1300

Maresa Bache
P.O. Box 9142
Tucson, AZ 85738
(520) 990.3542

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¹ A second copy of the entire notice and Certificate of Merit is served on the Attorney General, clearly marked "Attorney General Copy: Contains Official Information Pursuant to Evidence Code Section 1040" with all supporting documentation required by Section 3102 attached thereto.

Proposition 65 Notice Letter

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The Noticing Parties can be contacted through counsel as identified below:

Rachel Doughty

Greenfire Law, PC

1202 Oregon Street

Berkeley, CA 94702

(828) 424.2005

rdoughty@greenfirelaw.com

Sincerely,

A handwritten signature in cursive script, reading "Rachel S. Doughty".

Rachel Doughty

cc: Attorney General (without Summary and with additional confidential information supporting Certificate of Merit)

District Attorneys and City Attorneys listed in Certificate of Service (without Summary)

Attachments:

Certificate of Merit

Certificate of Service

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): A Summary ("Summary")