

July 03, 2024

Annual Asbestos Notification
Hills Plaza Complex
San Francisco, California

To Whom It May Concern:

The purpose of this letter is to provide notice to Hills Plaza Complex employees, tenants, and vendors of the presence of asbestos-containing materials (ACMs) that exist inside the buildings. This annual notification is required by California law (Health and Safety Code §25915 et seq., Cal/OSHA asbestos construction work standard, 8 CCR § 1529, and Health and Safety Code § 25249.5). In keeping with the practice of maintaining a safe and healthy work environment we provide notice to you of the presence of known and presumed asbestos and other potentially hazardous materials in the Hills Plaza Complex. It is the responsibility of the managers of building employees, tenants and vendors to pass this information along to your staff to ensure that everyone is informed about the presence of asbestos containing materials at the building.

I. Asbestos

A. Areas of Known and Presumed Asbestos-Containing Materials

Asbestos was widely used in fireproofing and insulation materials from the 1930s to the late 1970s. As a result, more than 750,000 buildings in this country contain some quantity of asbestos. As described below, surveys of the Hills Plaza Complex indicate that asbestos-containing material (“ACM”) was used in its construction. The timeline for the EPA Ban on asbestos is described below and more detailed information can be found at: <https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos>

1989 Partial Ban on the manufacture, import, processing, and distribution of some asbestos-containing products. EPA also banned new uses of asbestos which prevent new asbestos products from entering the marketplace after August 25, 1989. These uses remain banned. The April 2019 final rule does not provide a way for these uses to return to the marketplace. The manufacture, importation, processing, and distribution of ONLY the following asbestos-containing products were banned under TSCA in 1989.

- *Corrugated paper*
- *Rollboard*
- *Commercial paper*
- *Specialty paper*
- *Flooring felt*
- *New commercial uses that begin after August 25, 1989*

Materials not included in the 1989 Ban:

- *Adhesives, sealants and roof and non-roof coatings*
- *Arc chutes*
- *Beater-add gaskets*
- *Extruded sealant tape and other tape*
- *Filler for acetylene cylinders*
- *High-grade electrical paper*
- *Millboard*
- *Missile liner*
- *Pipeline wrap*
- *Reinforced plastics*
- *Roofing felt*
- *Separators in fuel cells and batteries*
- *Vinyl-asbestos floor tile*
- *Any other building material (other than cement)*

Under the Clean Air Act (CAA), the following asbestos-containing uses are banned.

- Asbestos pipe insulation and asbestos block insulation on facility components, such as boilers and hot water tanks, if the materials are either pre-formed (molded) and friable or wet-applied and friable after drying.
- Spray-applied surfacing asbestos-containing materials and Spray-on application of materials containing more than 1% asbestos to buildings, structures, pipes, and conduits unless certain conditions specified under [40 CFR 61, Subpart M](#) are met.

Under the Consumer Product Safety Act (Consumer Product Safety Commission), asbestos in artificial fireplace embers and wall patching compounds are banned. Under the Food and Drug Administration (FDA), asbestos-containing filters in pharmaceutical manufacturing, processing and packing are banned.

April 2019 Final Rule to ensure that ALL asbestos products that are no longer on the market cannot return to commerce without the Agency evaluating them and putting in place any necessary restrictions or prohibiting use. The uses covered under this rule were not already prohibited under TSCA and could have returned to the market at any time.

Risk evaluation of asbestos under TSCA. EPA is reviewing a handful of very limited, still ongoing uses of asbestos. The evaluation of the risks associated with ongoing uses of asbestos is required under TSCA section 6. If EPA finds unreasonable risk, the Agency will take prompt action to address those risks.

The following Hills Plaza building materials are considered suspected asbestos containing material (SACM) or presumed asbestos containing material (PACM) and the Building's extensive and ongoing surveys indicate that the materials were observed in good condition:

- Sheetrock joint compound
- Floor tiles and mastic
- Roof materials, felts and mastics

For further information about the location of known SACM or PACM within the building, please consult the "Hills Plaza Asbestos Operations & Maintenance Manual" ("Asbestos O&M Manual"). From time to time, Hills Plaza or its tenants contract for remodeling. All contractors are required to comply with applicable laws and perform work in accordance with general industry standards, the Hills Plaza Construction Specifications and the Asbestos O&M Manual. Any work which would likely disturb asbestos fibers is conducted in a containment area. Air monitoring is conducted routinely during the work in areas outside the containment area to assure that the work was performed as required. All surveys for ACMs, including detailed descriptions of the analytical methods employed, the Asbestos O&M Manual and air monitoring results are available for inspection at the Building Management Office during normal business hours.

In the event that you encounter any suspect ACM or PACM that has not been identified in the Asbestos O&M Manual or, or encounter any ACM or PACM that is damaged or in poor condition, please do not disturb the ACM and immediately notify the Building Management Office at (415) 777-3345 or Building Security.

B. Health Risks Associated with Asbestos

The human health effects from long-term unsafe asbestos exposure are well documented. Asbestos fibers are easily inhaled and carried into the lower regions of the lung where they can cause fibrotic lung disease (asbestosis) and changes in the lining of the chest cavity (pleura). These diseases can lead to reduced respiratory function and death. Long-term inhalation of asbestos fibers also increases the risk of lung cancer and mesothelioma. Asbestos is known to the State of California to cause cancer.

C. Asbestos Work Guidelines

Any repairing, moving, drilling, boring, or otherwise disturbing any known or presumed ACM may release asbestos fibers. *Prior to commencement of any demolition or renovation, the owner or operator or tenant shall thoroughly survey the affected area or portion thereof for the presence of asbestos-containing material in accordance with BAAQMD regulation 11-2-303.8.* Any such activity must be undertaken in accordance with all applicable laws and the Asbestos O&M Manual, and shall not be attempted by anyone who is not qualified to handle ACM. Any known or presumed ACM shall not be repaired, moved, drilled, bored, or otherwise disturbed except under the supervision of a “competent person” as defined in the Cal/OSHA regulation and in accordance with all applicable regulations of Cal/OSHA, DTSC, BAAQMD, U.S.EPA and the City and County of San Francisco.

To ensure that these procedures are effective, it is important that building tenants avoid any activity that could disturb asbestos-containing materials. All tenant leases include the requirements that prior to any construction or repair work schedule or started that the building office grant prior approval before the work can be scheduled or started. If you are performing any work subject to regulation under any asbestos regulatory program, or if you are unsure whether your proposed activity will disturb ACMs, you must provide a 48-hour advance notice to the Building Management Office.

II. Proposition 65

A number of building materials in this building have been identified as chemicals known to the State of California to cause cancer, birth defects or other reproductive harm. These chemicals include, but are not limited to, formaldehyde, lead, vinyl chloride, crystalline silica, tobacco smoke, diesel and gasoline engine exhaust and their constituents, carbon black and others. Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, requires that you be warned of the presence of these materials. In accordance with that law, signs are posted in the building with the following warning:

WARNING: This building contains chemicals known to the State of California to cause cancer, birth defects or other reproductive harm.

Please feel free to contact me at the Building Management Office at (415) 777-3345 if you have any questions about this letter. Jones Lang LaSalle is committed to maintaining a safe and pleasant physical working environment for all employees and tenants.

Sincerely,



Hal Brownstone
General Manager