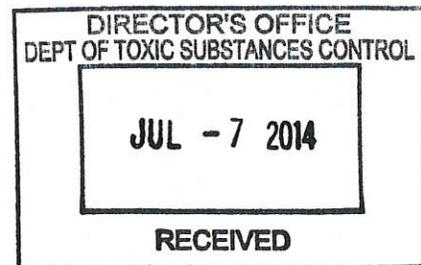




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(916) 383-7590 * Greater Sacramento

June 30, 2014

Department of Toxic Substances Control
PO Box 806
Sacramento, CA 95812-0806



Dear Sirs

I am writing to you as a Small Business Owner of 20 years in the State of California. My Company is has been Spraying Polyurethane Foam residentially for 11 years along with other types of Insulation.

I became aware of the DTSC's "Priority Products List" first by an Article in the Sacramento Bee and of course there after by the Spray Polyurethane Foam Alliance which we are a member.

I was very upset to see that several references to "Unreacted Diisocyanates" as being a problem where mentioned and its effect in regards to Asthma and other respiratory illnesses.

Overall there was plenty of misinformation which contributed to numerous calls by current and former customers being in a panic since the State is now declaring a Ban on Spray Foam.

It is unfortunate that The DTSC had not chosen there words more carefully to avoided all the false accusations about Spray Polyurethane Foam.

Installing SPF for 11 years we have and continue to make safety our top priority. The EPA and OSHA along with several other Federal Agencies have over the years worked with the Industry to provide not only accurate information but best practices for both the worker and end user.

After attending two Workshops and Breakout sessions it has become perfectly clear that DTSC did not make any attempt to involve the Spray Polyurethane Foam Industry or anyone else directly or indirectly involved with Diisocyanates.

Numerous references to Chemicals and Chemical Listings were repudiated by Experts in the Field of Toxicology.

Many others expressed disappointed in the fact that just some common due diligence would have made a big difference and would have cultivated a spirit of cooperation with the DTSC instead of an adversarial one that now exists.

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The economic effect on my business already has been dramatic.
I have had a National Builder decide not to use Spray Polyurethane Foam in 8 subdivisions which amount to 5 to 6 Million Dollars.
That is where the "Rubber meets the Road"
That along with several Architects deciding for the time being not to Spec SPFA amounts to lost revenue and potential Jobs.

DTSC has heard all the comments and real facts presented from all the Industry Experts. This should allow DTSC to go back and clear up all the misrepresentations and non factual information and put together a accurate statement that clearly identifies what the issues are. This would go a long way toward getting the real information to speak for its self.

No one in the Spray Polyurethane Foam Industry has anything to hide and is willing to go along with this process but it must first start out with solid information.

I hope that DTSC can make corrections to the Website and put together a more accurate statement so that all of us in the Industry can continue to work together to provide Consumer Safe and Environmentally Friendly Spray Polyurethane Foam.

Sincerely

Gary Talbott
President

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