



June 30, 2014

Dr. Meredith Williams
Deputy Director
California Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814

RE: Comments on the DTSC Priority Product Profile for "Spray Polyurethane Foam Systems Containing Unreacted Diisocyanates"

Dear Meredith and other Members of the California DTSC:

Fomo Products appreciates the opportunity to submit comments regarding the nomination of Spray Polyurethane Foam (SPF) Systems Containing Unreacted Diisocyanates as an initial priority product under the California Environmental Protection Agency's Department of Toxic Substances Control (DTSC) Safer Consumer Products Regulations.

We respectfully ask that the DTSC remove Low Pressure Spray Polyurethane Foam (SPF) and One Component Foam (OCF) Systems from the draft list of Initial Priority Products due to the following reasons:

- I. Under Problem Identified in the Product Profile; "DTSC is particularly concerned about the increasing number of both independent contractors and do-it-yourselfers using SPF systems. These workers may not be aware of the serious health risks associated with these products, and may not follow NIOSH or industry recommendations for engineering controls and the use of personal protective equipment when applying SPF Systems (US EPA, 2014)."
 - a. Fomo Products educates our distributors and end-users in the following ways:
 - i. Work Smart Campaign that focuses on training our distributors and end-users: Work Smart is about choosing the best solution and product for energy efficient applications and then executing the project safely. We trained our existing distributors and now require that every new distributor is trained.
 - ii. Developed a product stewardship brochure (attached) that addresses the following items:
 1. Personal Protective Equipment (PPE) Guidelines
 2. Ventilation Guidance
 3. MDI exposure case study-Weatherization Applications
 4. Marketing Guidelines
 5. Safe Handling & Use
 6. Difference between Low Pressure and High Pressure Products
 7. Disposal & Storage
 8. Availability of Product Resources.
 - iii. Updated our operating instructions to include PPE and Safety Guidance.
 - iv. Added a (M)SDS packet to every kit. Please see attached Fomo Packaging slides.
 - v. Use of PPE pictograms on our literature. Please see attached Fomo Packaging slides.
 - vi. Developed an on-line training program- University of Fomo: www.fomo.com



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- vii. E-blasts sent continually to our distributors and end-users to keep them informed of training options and product updates.
 - viii. Conducted multiple personal and area MDI air monitoring during actual applications. Conducted MDI air monitoring in worst case scenerios, i.e. enclosed area with no mechanical ventilation. Please see attached presentations: Bloom 2012, Fishback 2012 and CPI-SPFA Low Pressure Webinar 2009.
 - ix. ULe GREENGUARD Certifications- Gold Status.
 - x. Use of Colorwise™ nozzles (cold temperature indicator nozzles), which adds insurance that installed foam is working at its peak performance and is being installed at appropriate temperature.
 - xi. Promotion of industry available training.
 - 1. Spray Polyurethane Foam Chemical Health and Safety On-line Training:
<http://www.spraypolyurethane.org/>
 - 2. On-Line training videos, charts and guidance:
<http://www.spraypolyurethane.org/Main-Menu-Category/Weatherization-Contractors.aspx>
- II. The product profile also talks about respiratory toxicity, " However, most studies involving the toxicity of diisocyanates focus on TDI because it has been shown to be a more significant inducer of asthma as compared to MDI and HDI (Butcher et al., 1986)."
- a. We feel this claim is focused on TDI. We do not use TDI or HDI in the manufacturing of our products.
- III. Low pressure SPF is dispensed at pressures below 250 psi. In contrast, high pressure SPF (i.e. drum systems) is dispensed at roughly 1200 psi. This difference provides significant advantages for low pressure foams during installation or application:
- a. Less overspray
 - b. More control
 - c. No atomization (product meets and mixes in the static mixer before output, i.e. polymerization)
 - d. Faster building re-occupancy after install
- IV. One-Component Foams (OCF) products are single can systems. The components are pre-mixed in the can before output. All internal MDI exposure studies for OCF cans have shown no detectable airborne amounts of MDI.

We respectfully suggest that the DTSC reconsider its selection of Low Pressure SPF and OCF as an initial candidate for consideration under California's Safer Consumer Products Regulations.

Best regards,

Sandra Gump
Product Compliance Manager
Fomo Products, Inc.



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