



Kelly Grant  
Senior Environmental Scientist  
Department of Toxic Substances Control  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95814-2828

**RE: Department of Toxic Substances Control (DTSC) Request for Additional Information Related to Implementation of the Product Information to Consumers Regulatory Response (22 CCR § 69506.3) and Use Restriction on Chemicals and Consumer Products (Training Requirement) Regulatory Response (22 CCR § 69506.4)**

Dear Ms. Grant,

SWD Urethane is providing the requested information related to the number of spray foam installers and contractors trained in California over the last three years. Additionally, SWD Urethane incorporates by reference the report submitted by Huntsman that shows the total number of SPF contractors and installers in the state.

According to the [CPI Spray Polyurethane Foam Chemical Health and Safety Training program](#) searchable database, 613 people in California have taken the training program for high-pressure foam in the past three years, and approximately 2100 people in California have taken the high-pressure training program since its launch in December 2010.

The certificate of completion lasts for three years, so renewals or classes taken right before 2020 are likely not reflected in this number. The CPI Spray Polyurethane Foam Chemical Health and Safety Training program is a free, online health and safety training program that currently includes high- and low-pressure spray foam. It is currently provided in three languages – English, French, and Spanish. The program is voluntary and includes a database that can be accessed, where [user completion status](#) can be looked up using a unique identification number.

Please reach out if you have any additional questions by email at [paul.warren@swdurethane.com](mailto:paul.warren@swdurethane.com) or by phone at (800) 828-1394.

Sincerely,

Paul Warren  
Building Science and Technology Manager  
SWD Urethane