



July 9, 2020

Meredith Williams, Ph.D.
Director
Department of Toxic Substances Control
California Environmental Protection Agency
1001 I Street
Sacramento, California 95812-0806

Dear Director Williams,

On June 30, 2020, the Department of Toxic Substances Control (DTSC) issued a Notice of Deficiency (NOD) on the American Chemistry Council's Spray Foam Coalition (SFC) Abridged Alternatives (AA) Analysis Report on Two-component Low- and High-pressure Spray Polyurethane Foam (SPF) Systems Containing Unreacted Methylene Diphenyl Diisocyanate (MDI). The SFC and responsible entities (REs) developed the Abridged AA report to respond to DTSC's listing of SPF Systems with unreacted MDI as a priority product under the California Safer Consumer Product regulations.

SFC and the REs respectfully request a full 90-day extension for the submission of a revised AA report in response to the NOD. The original due date for the revised AA report is August 31, 2020. This 90-day extension request would extend the due date to November 29, 2020. 22 CCR §69505.9(c)(2)(A) allows responsible entities to seek a one-time extension, up to 90 days under 22 CCR §69505.1(c), to finalize and submit a response to a NOD. The SFC and REs are requesting a 90-day extension to provide the necessary time to review, interpret, and respond to 95 new and discrete comments provided by DTSC in the NOD. The SFC's Abridged AA report is the first Abridged AA report or final AA report submitted under the SCP regulations. Accordingly, because there is no template or existing Abridged AA report to use as a guide, the SFC and REs could not have reasonably anticipated the extensive set of comments issued in the NOD. Further, the NOD included extended, detailed, comments that we have not seen before and expand far beyond the public comments the REs received in the Notice of Comment (NOC), when DTSC provided 120 days to develop a revised AA report.

The RE Consortium represented by ACC consists of 17 responsible entities. Additionally, the Spray Foam Coalition represents 11 suppliers to the SPF market. COVID-19 has significantly impacted business, a situation DTSC has previously acknowledged by providing an extension for the response to the NOC, and will result in difficulties interviewing subject matter experts, collecting information from Consortium members, and reviewing the revised AA report with the REs. The continued persistence of COVID-19, extended social distancing requirements, and business impacts could not have been reasonably anticipated or controlled by the responsible entities.

Finally, we realize after reviewing the comments in the NOD that addressing DTSC's comments may require multiple iterative conversations with Department, which will likely not be possible to schedule during the 60-day window; the extension will make it possible to have such

conversations and increase the likelihood that the revised AA report will address the Agency's comments. Accordingly, we would like to request a meeting with DTSC to discuss the NOD.

My contact information and contact information for the responsible entities, on whose behalf this extension request is being submitted, is available in Appendix 1. The responsible entities priority products are high- and low-pressure two component SPF systems, which contain unreacted MDI. Detailed priority product information, including brands, is included in Appendix 2.

Please feel free to contact me at stephen_wieroniey@americanchemistry.com or 202-249-6617 with any questions regarding this 90-day extension request and to schedule a meeting to discuss the NOD.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Wieroniey", with a stylized flourish at the end.

Stephen Wieroniey
Director

Appendix 1 – Contact Information

First Name	Stephen
Last Name	Wieroniey
Company	American Chemistry Council
Involvement	Coordinating the AA effort
Email	Stephen_wieroniey@americanchemistry.com
Phone	202-249-6617
Address	700 Second Street NE, Washington, DC 20002

Responsible Entities (REs) Information:

First Name	Jon
Last Name	Purcell
Company	Accella Polyurethane Systems
Business Type	Manufacturer
Email	Jon.Purcell@carlislePS.com
Phone	314-764-2814
Website	https://www.carlislePS.com/
Address	2500 Adie Road, Maryland Heights, MO 63043

First Name	Peter
Last Name	Bartell
Company	A&B Filling Inc.
Business Type	Manufacturer
Email	peter@abfilling.com
Phone	262-754-8060
Address	5500 S. Westridge Dr. New Berlin, WI 53151

First Name	Megan
Last Name	Szyndler
Company	BASF Corporation
Business Type	Manufacturer
Email	megan.szyndler@basf.com
Phone	734 324-2671
Website	www.spf.basf.com
Address	BASF Corporation, 1703 Crosspoint Avenue, Houston, TX 77054

First Name	Neema
Last Name	Toolaabee
Company	DAP Products Inc.
Business Type	Manufacturer
Email	ntoolaabee@dap.com
Phone	410-779-2338
Website	www.dap.com
Address	2400 Boston Street, Suite 200, Baltimore, MD 21224

First Name	Doug
Last Name	Brady
Company	Demilec ¹
Business Type	Manufacturer
Email	doug.brady@demilec.com
Phone	817-640-4900
Website	www.demilec.com
Address	3315 East Division Street, Arlington, TX 76011

[1] Icyne-Lapolla and Demilec are now part of the Huntsman group of companies.

First Name	Lisa
Last Name	Massaro
Company	DuPont
Business Type	Manufacturer
Email	lisa.m.massaro@dupont.com
Phone	989-638-4248
Website	www.dupont.com
Address	Performance Building Solutions, 1501 Larkin Center Drive, 200 Building, Midland, MI 48640

First Name	Nilo
Last Name	Noxon
Company	Firestone Building Products
Business Type	Manufacturer
Email	NoxonNilo@bfusa.com
Phone	262-832- 0748
Website	www.firestonebpco.com
Address	1245 Chapman Drive, Waukesha, WI 53186

First Name	Don
Last Name	Schumacher
Company	Foam Supplies, Inc.
Business Type	Manufacturer
Email	dschumacher@foamsupplies.com
Phone	314-344-3330
Website	www.foamsupplies.com

Address	4387 North Rider Trail, Earth City, MO 63045
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First Name	Eric
Last Name	Montie
Company	General Coatings Manufacturing Corp.
Business Type	Manufacturer
Email	eric@generalcoatings.net
Phone	559-495-4004
Website	https://www.generalcoatings.net
Address	1220 East North Avenue, Fresno, CA 93725

First Name	Whitney
Last Name	Randall
Company	Henry Company LLC
Business Type	Manufacturer
Email	WRandall@henry.com
Phone	484-557-1247
Website	www.henry.com
Address	999 North Pacific Coast Highway, Suite 800, El Segundo, CA 90245

First Name	Sandy
Last Name	Gump
Company	ICP Adhesives & Sealants
Business Type	Manufacturer
Email	sgump@icpadhesives.com
Phone	330-753-4585
Website	www.handifoam.com
Address	2775 Barber Road, Norton, OH 44203

First Name	Steve
Last Name	Williams
Company	Icynene-Lapolla ¹
Business Type	Manufacturer
Email	swilliams@icynene-lapolla.com
Phone	281-219-4100
Website	www.icynene.com or www.lapolla.com
Address	15402 Vintage Parkway East, Suite 322, Houston, TX 77032

[1] Icynene-Lapolla and Demilec are now part of the Huntsman group of companies.

First Name	Kathryn
Last Name	Miks
Company	Johns Manville
Business Type	Manufacturer
Email	Kathy.Miks@jm.com
Phone	303-978-2000

Website	www.jm.com
Address	717 17 th Street, Denver, CO 80202

First Name	Jason
Last Name	Hoerter
Company	Barnhardt Manufacturing Company dba NCFI® Polyurethanes
Business Type	Manufacturer
Email	Jason.Hoerter@ncfi.net
Phone	800-346-8229
Website	www.ncfi.net
Address	71515 Carter Street, Mount Airy, NC 27030

First Name	Jose
Last Name	Luna
Company	SES Foam LLC
Business Type	Manufacturer
Email	JLuna@SESFoam.com
Phone	713-239-0252
Website	www.sesfoam.com or www.sucraseal.com
Address	4008 Louetta Road #538, Spring, TX 77388

First Name	Paul
Last Name	Warren
Company	SWD Urethanes
Business Type	Manufacturer
Email	Paul.Warren@swdurethane.com
Phone	800-828-1394
Website	www.swdurethane.com
Address	540 South Drew Street, Mesa, AZ 85210

First Name	Nelson
Last Name	Medina
Company	Rhino Linings Corporation
Business Type	Manufacturer
Email	nmedina@rhinolinings.com
Phone	858-410-6007
Website	www.rhinolinings.com
Address	9747 Business Park, San Diego CA 92131

Appendix 2 – Priority Product Information

Manufacturer Name	Product Name
Accella Polyurethane Systems ¹	FOAMSULATE 220 SERIES
Accella Polyurethane Systems	FOAMSULATE 210 SERIES
Accella Polyurethane Systems	Foamsulate 50 NIB
Accella Polyurethane Systems	BAYSEAL OC
Accella Polyurethane Systems	BAYSEAL OC X
Accella Polyurethane Systems	BAYSEAL CC X
Accella Polyurethane Systems	BAYSEAL 2.7 Series ²
Accella Polyurethane Systems	BAYSEAL 3.0 Series
Accella Polyurethane Systems	QuadForm NatureSeal OCX
Accella Polyurethane Systems	PREMISEAL 305 ³
Accella Polyurethane Systems	PREMISEAL 350 ⁴
Accella Polyurethane Systems	Bayseal OC HY
Accella Polyurethane Systems	QuadFoam 2.0
Accella Polyurethane Systems	QuadFoam 500
Accella Polyurethane Systems	Premipour 202M
Accella Polyurethane Systems	PREMISEAL 40 SERIES
Accella Polyurethane Systems	PREMISEAL 60 SERIES
Accella Polyurethane Systems	PREMISEAL 70 SERIES
Accella Polyurethane Systems	PREMISEAL 80 SERIES
Accella Polyurethane Systems	PREMISEAL 250 SERIES
Accella Polyurethane Systems	PREMISEAL 255 SERIES
Accella Polyurethane Systems	PREMISEAL 280 SERIES
Accella Polyurethane Systems	PREMISEAL 285 SERIES
Accella Polyurethane Systems	PREMISEAL 300 SERIES
Accella Polyurethane Systems	PREMIR+ 60 SERIES
Accella Polyurethane Systems	PREMIR+ 40 SERIES
Accella Polyurethane Systems	FOAMSULATE CLOSED CELL SERIES
Accella Polyurethane Systems	FOAMSULATE HFO SERIES
Accella Polyurethane Systems	FOAMSULATE 50 HY
Accella Polyurethane Systems	FOAMSULATE 50
Accella Polyurethane Systems	FOAMSULATE OCX
Accella Polyurethane Systems	FOAMSULATE 70
Accella Polyurethane Systems	SEALTITE PRO CLOSED CELL SERIES
Accella Polyurethane Systems	SEALTITE PRO HIGH YIELD
Accella Polyurethane Systems	SEALTITE PRO NO MIX
Accella Polyurethane Systems	SEALTITE PRO NO TRIM
Accella Polyurethane Systems	SEALTITE PRO OCX
Accella Polyurethane Systems	SEALTITE PRO ONE ZERO
Accella Polyurethane Systems	SEALTITE PRO OPEN CELL
A&B Filling Inc.	Brand A Product 1
A&B Filling Inc.	Brand B Product 2
A&B Filling Inc.	Brand C Product 3

Manufacturer Name	Product Name
A&B Filling Inc.	Brand D Product 4
BASF Corp.	Elastospray 81255
BASF Corp.	Elastospray 81285
BASF Corp.	Elastospray 81305
BASF Corp.	Elastospray 8000A ⁵
BASF Corp.	ENERTITE G
BASF Corp.	ENERTITE NM
BASF Corp.	FE 348-2.5
BASF Corp.	FE 348-2.8
BASF Corp.	FE 348-3.0
BASF Corp.	SKYTITE 2.5
BASF Corp.	SKYTITE 2.8
BASF Corp.	SKYTITE 3.0
BASF Corp.	SPRAYTITE 158
BASF Corp.	SPRAYTITE 178
BASF Corp.	SPRAYTITE 180
BASF Corp.	SPRAYTITE 81206
BASF Corp.	SPRAYTITE SP
BASF Corp.	WALLTITE US
BASF Corp.	WALLTITE HP+
BASF Corp.	BASF CBI - #1
BASF Corp.	BASF CBI - #2
BASF Corp.	BASF CBI - #3
BASF Corp.	BASF CBI - #4
BASF Corp.	BASF CBI - #5
BASF Corp.	BASF CBI - #6
BASF Corp.	BASF CBI - #7
BASF Corp.	BASF CBI - #8
BASF Corp.	BASF CBI - #9
BASF Corp.	BASF CBI - #10
BASF Corp.	BASF CBI - #11
BASF Corp.	BASF CBI - #12
BASF Corp.	BASF CBI - #13
BASF Corp.	BASF CBI - #14
BASF Corp.	BASF CBI - #15
BASF Corp.	BASF CBI - #16
BASF Corp.	BASF CBI - #17
BASF Corp.	BASF CBI - #18
DAP Products, Inc.	Touch n' Seal Fire-Rated 1.75 PCF Slow Rise Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Seal 1.75 PCF ICC Closed Cell Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Seal 2.0 PCF Fire-Rated Polyurethane Foam Sealant

Manufacturer Name	Product Name
DAP Products, Inc.	Touch n' Seal 3.0 PCF High Density Closed Cell Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Seal Mine Foam Sealant
DAP Products, Inc.	Touch n' Foam Professional Fire-Rated 1.75 PCF CCMC Closed Cell Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Foam Fire-Rated 1.75 PCF Closed Cell ICC Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Seal Fire-Rated Low Density 1.0 PCF Open Cell Polyurethane Foam Sealant
DAP Products, Inc.	Touch n' Seal 1.75 PCF Fire Rated PCF CCMC Closed Cell Polyurethane Foam Sealant
Demilec	Agribalance
Demilec	Demilec APX
Demilec	Heatlok HFO High Lift
Demilec	Heatlok HFO Pro
Demilec	Heatlok Soy 200+
Demilec	Heatlok XT
Demilec	Sealection 500
DuPont ⁶	FrothPak™ Sealant and Insulation
DuPont	FrothPak™ Ultra Insulation
DuPont	Styrofoam™ Dow 3019 with CM2045
Firestone	F1800 – GacoTrenchFoam – Polyol Component B
Firestone	F-CF2030 – GacoPourFoam CF2030 – Polyol Component B
Firestone	FB28-120 – GacoFlashFoam – Component A & B
Firestone	F10000 – GacoToughFoam – Polyol Component B
Firestone	F183M – Gaco 183M– Polyol Component B
Firestone	F1850R – GacoOnePass – Polyol Component B
Firestone	F052N – Gaco 052N GacoInsulBarrier – Polyol Component B
Firestone	F5001 –GacoFireStop 2 – Polyol Component B
Firestone	F4500R – GacoEZSpray – Polyol Component B
Firestone	FR6500R – GacoProFill – Polyol Component B
Firestone	F1880R – GacoOnePass Low GWP – Polyol Component B
Firestone	F2733R – GacoRoofFoam – Polyol Component B
Firestone	ISO – Isocyanate – Iso Component A ⁷
General Coatings Manufacturing Corp.	Brand A 1, 2.5
General Coatings Manufacturing Corp.	Brand A 2, 2.7
General Coatings Manufacturing Corp.	Brand A 3, 3.0

Manufacturer Name	Product Name
General Coatings Manufacturing Corp.	Brand B 1, 2.5
General Coatings Manufacturing Corp.	Brand B 2, 2.7
General Coatings Manufacturing Corp.	Brand B 3, 3.0
General Coatings Manufacturing Corp.	Ultra-Thane 050
General Coatings Manufacturing Corp.	Ultra-Thane 050 OCX
General Coatings Manufacturing Corp.	Ultra-Thane 170 Pour Foam
General Coatings Manufacturing Corp.	Ultra-Thane 230-2.0 ⁸
General Coatings Manufacturing Corp.	Ultra-Thane 230-2.5, 2.7, and 3.0 Roof Foam
General Coatings Manufacturing Corp.	Universal Polymers Corp 2.0
General Coatings Manufacturing Corp.	Universal Polymers Corp 500
General Coatings Manufacturing Corp.	Universal Polymers Corp 500 OCX
Henry Company LLC	Permax Closed-cell Foam Insulation
ICP Adhesives & Sealants	Handi-Foam® E84 Spray Foam
ICP Adhesives & Sealants	Handi-Foam® Quick Cure
ICP Adhesives & Sealants	Handi-Foam® Air Seal
ICP Adhesives & Sealants	Handi-Foam® Low Density
ICP Adhesives & Sealants	Handi-Foam® Wall Seal
ICP Adhesives & Sealants	Brand A Product 1
ICP Adhesives & Sealants	Brand B Product 1
ICP Adhesives & Sealants	Brand B Product 2
ICP Adhesives & Sealants	Brand B Product 3
Icynene-Lapolla	Icynene Classic Plus™
Icynene-Lapolla	Icynene Classic™
Icynene-Lapolla	Icynene Classic Eco
Icynene-Lapolla	Icynene Classic Max
Icynene-Lapolla	Icynene MDC 200 V6
Icynene-Lapolla	Icynene MDR 210
Icynene-Lapolla	ProSeal Eco
Icynene-Lapolla	Icynene ProSeal
Icynene-Lapolla	Lapolla Foam-LOK FL500
Icynene-Lapolla	Lapolla Foam-LOK FL2000
Icynene-Lapolla	Lapolla Foam-LOK FL2000 – 4G
Icynene-Lapolla	Lapolla Foam-LOK LPA 2500

Manufacturer Name	Product Name
Icynene-Lapolla	Lapolla Foam-LOK LPA 2800
Johns Manville ⁹	JM Corbond III® SPF
Johns Manville	JM Corbond® oc SPF
Johns Manville	JM Corbond® ocx SPF
NCFI Polyurethanes ¹⁰	10-011
NCFI Polyurethanes	10-013
NCFI Polyurethanes	11-016
NCFI Polyurethanes	11-017
NCFI Polyurethanes	11-033
NCFI Polyurethanes	11-035
NCFI Polyurethanes	11-036
NCFI Polyurethanes	11-037
NCFI Polyurethanes	12-008
Rhino Linings Corporation	ThermalGuard ISO, A Component
Rhino Linings Corporation	Duratite CC2.5, B Component
Rhino Linings Corporation	Duratite CC2.8, B Component
Rhino Linings Corporation	Duratite CC3.0, B Component
Rhino Linings Corporation	ThermalGuard CC2, B Component
Rhino Linings Corporation	ThermalGuard OC 1.0, B Component
Rhino Linings Corporation	ThermalGuard OC 0.5, B Component
SES Foam LLC	EasySeal.5 Spray Foam
SES Foam LLC	Nexseal™ 2.0, 2.0W, 2.0 LE, 2.0 LE W
SES Foam LLC	SES 2.5, SES 2.5 S, SES 2.5 W
SES Foam LLC	SES 2.7, SES 2.7 S, SES 2.7W
SES Foam LLC	SES 3.0, SES 3.0 S, SES 3.0W. SES 3.0HCS
SES Foam LLC	Sucraseal™ 0.5 lb Spray Foam
SWD Urethane	Quik-Shield 100X
SWD Urethane	Quik-Shield 106
SWD Urethane	Quik-Shield 108
SWD Urethane	Quik-Shield 112
SWD Urethane	Quik-Shield 118
SWD Urethane	Quik-Shield 125
SWD Urethane	Quik-Shield 450