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February 8, 2022

The Honorable C.T. Wilson, Chair, Economic Matters Committee

The Honorable Brian T. Crosby, Vice-Chair, Economic Matters Committee

**Re: ICAA Written Testimony Related to HB 108 – Public Utilities – Energy Efficiency and Conservation Programs – Energy Performance Targets and Low-Income Housing**

Dear Committee Chairman Wilson and Vice-Chair Crosby,

ICAA is a 45-year old membership organization representing residential and commercial building thermal insulation contractors and their insulation suppliers. Our member contractors install all types of building insulation. Thank you for the opportunity to express our views on this matter.

It is ICAA's position that HB 108 should be amended by deleting 7-211.1 (B)(5), thereby permitting the use of spray polyurethane foam products and mineral wool insulation in low-income housing programs.

**Rationale**

1. Building occupants are not exposed to Category 1 respiratory sensitizers from polyurethane products, nor are they exposed to formaldehyde from mineral wool insulation.<sup>1</sup> There are no adverse health impacts from these building materials, either at the delivery side (installation) or the occupant side. Workers are protected by adhering to the manufacturers' installation and product stewardship recommendations and adhering to federally mandated respiratory and hazard communication requirements. Building occupants are not exposed to respiratory sensitizers because cured polyurethanes are inert and nontoxic.<sup>2</sup>

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<sup>1</sup> Mineral wool insulation products are determined compliant in accordance with California Department of Public Health (CDPH) Standard Method v1.2-2017.

<sup>2</sup> EPA MDI Chemical Action Plan: [www.epa.gov/sites/default/files/2015-09/documents/mdi.pdf](http://www.epa.gov/sites/default/files/2015-09/documents/mdi.pdf)

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2. There seems to be no evidence to support the exclusion of spray polyurethane foam and mineral wool insulation products in the proposed bill. According to the same criteria, many everyday construction materials and household products would need to be included. In fact, diisocyanates ranked 25<sup>th</sup> in a reporting of work-related asthmagen exposures in California workplaces, or lower than 24 other asthmagen exposures. The report [Asthma in California: A Surveillance Report, May 2013](#) sourced data from 1993 – 2008.<sup>3</sup>
3. Federal OSHA regulations and manufacturers' stewardship programs have guided the spray polyurethane foam and mineral wool insulation industries, which have complied with regulatory requirements that, among other things, mandate worker information on the safe use of these products. Employers and workers utilize engineering controls and work practices and implement a Hazard Communication Program and a Respiratory Protection Program.
4. An OSHA National Emphasis Program to evaluate overexposures of isocyanates was terminated in 2016, because OSHA did not find overexposures of isocyanates.<sup>4</sup>

In summary, the proposed restrictions are unnecessary, as there is no harm or hazard from the installation and use of these materials. Insulation contractors should have the freedom to provide an array of safe, sustainable, high-performance, cost-effective insulation materials including spray foam and mineral wool insulation. Please contact me if you have any questions or need additional information. Thank you for this opportunity to provide commentary.

Sincerely,

Michael Kwart  
ICAA Executive Director

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<sup>3</sup> *Asthma in California: A Surveillance Report, May 2013*, California Department of Public Health, Environmental Health Investigations Branch

<sup>4</sup> OSHA National Emphasis Program on Isocyanates, 2013 – 2016