



February 7, 2022

The Honorable Delores G. Kelley
Chair, Finance Committee

The Honorable Brian J. Feldman
Vice-Chair, Finance Committee

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

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

RE: SB 524 and HB 108 - Public Utilities - Energy Efficiency and Conservation Programs - Energy Performance Targets and Low-Income Housing

Dear Senator Kelley, Senator Feldman, Delegate Wilson, and Delegate Crosby,

Covestro is a chemical manufacturer supplying the spray foam market. Our chemistries help produce spray foam products that efficiently insulate and air-seal homes, helping fight climate change by improving the energy efficiency and climate resilience of residential homes in Maryland. You can learn more about the benefits of spray foam at www.whysprayfoam.org.

Covestro opposes the use of SB 524 and HB 108 to ban products that are used to increase the energy efficiency of new and existing buildings. Section (B)(5) is intended to ban the use of spray foam insulation from use in low-income housing. This bill will make it more difficult to insulate and weatherize existing low-income houses. Without adequate insulation, keeping homes warm in the winter and cool in the summer is more expensive and it requires the use of more electricity, which in turn results in more greenhouse gas emissions from the process of electricity generation.

Potential health risks associated with spray foam exposure that occurs during the installation process can be controlled by adhering to OSHA requirements and educating workers on proper workplace controls, such as appropriate ventilation and wearing personal protection equipment. Homeowners are protected by remaining an appropriate distance from the spray foam application work area during and for a period of time after spray foam is applied. Homeowners are not exposed to respiratory sensitizers because they are not present during application. Fully cured spray foam is [inert and non-toxic](#).

Banning the use of spray foam will have a negative impact on Maryland. We believe Maryland should encourage the use of spray foam products, because they:

- [Reduce greenhouse gas emissions](#)
- [Make buildings stronger](#)
- [Save homeowners money](#)

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Ensuring that low-income populations have access to the most energy-efficient products will maximize the benefits of the Weatherization Assistance Program and other low-income energy efficiency programs, as well as the taxpayer dollars used to fund these critical programs.

We believe SB 524 and HB 108 should be amended and the language banning certain insulation materials in section (B)(5) should be removed. Thank you for considering our input, and please contact me with any questions at rob.mcarver@covestro.com.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read "R. McArver", is written over a light blue rectangular background.

Robert D. McArver
Head of Government Affairs, North America
Sustainability & Public Affairs

CC: Delegate Lorig Charkoudian