

February 5, 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 Pendergrass, and Delegate Pena-Melnyk,

ICP Group supplies products to contractors that install spray foam in Maryland. Our work insulating and air-sealing homes helps 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.

ICP Group 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.

Our company adheres to robust health and safety recommendations to protect our workforce. Potential health risks associated with spray foam exposure are occupational in nature and can be controlled by adhering to OSHA requirements and educating workers on implementing proper workplace controls, such as appropriate ventilation and wearing proper personal protection equipment. Other trade workers and 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 application. Homeowners are not exposed to respiratory sensitizers because they are not present during application and fully cured spray foam is inert and nontoxic.

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 can help:

- Reduce greenhouse gas emissions,
- Make buildings stronger, and
- Save homeowners money.

ICP Group, distributors, and contractors provide numerous jobs in Maryland. Our contractors safely install spray foam every day by adhering to industry best practices developed by our suppliers. Implementing SB 524 and HB 108 as written will negatively impact our business.

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 and the taxpayer dollars used to fund these critical programs.

SB 524 and HB 108 should be amended and the language banning certain insulation materials in section (B)(5) should be removed. Please contact me with any questions at tkenworthy@icpgroup.com.

Sincerely,



Tim Kenworthy
Vice President – Insulation, Environmental Restoration & Adhesives
ICP Group

CC: Delegate Lorig Charkoudian