



February 4, 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:

BASF Corporation respectfully 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.

BASF Corporation is the North American subsidiary of BASF SE, a leading global chemistry company. At BASF, we create chemistry for a sustainable future. We combine economic success with environmental protection and social responsibility. Through science and innovation, we enable our customers in nearly every industry to meet the current and future needs of society.

BASF manufactures both closed-cell and open-cell spray polyurethane foam products for residential and commercial construction, providing the right SPF system for any type of well-engineered building envelope. To learn more about our products, please visit [BASF SPF: Resources for Homeowners, Contractors, Building Owners and Specifiers](#).

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](#).

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 them.

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 [michael.heltzer@basf.com](mailto:michael.heltzer@basf.com).

Sincerely,

/MEH/

Michael E. Heltzer  
Head of State Government Affairs

cc: Delegate Lorig Charkoudian