

OWENS CORNING

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GRANVILLE, OHIO 43023



June 30, 2014

Department of Toxic Substances Control (DTSC)
Safer Products and Workplaces Program
P.O. Box 806
Sacramento, CA 95812-0806

Re: Priority Product Listing -
Spray Polyurethane Foam (SPF) Systems Containing Unreacted Diisocyanates

Dear DTSC:

Owens Corning (OC) is a leading United States manufacturer of building insulation and roofing systems, with California production facilities in Santa Clara (fiberglass insulation) and Compton (roofing shingles). OC submits this letter to the DTSC to express our support for the Department's listing of professional grade SPF systems as a Priority Product under California's Safer Consumer Products regulations.

As an industry leader, OC continuously evaluates insulation systems in our continuing effort to innovate and provide consumers and businesses with the best insulating systems available. One insulating system that OC has evaluated several times over the past decade is professional grade SPF systems using isocyanate containing raw materials. Each time, OC has decided not to pursue an SPF product line. In OC's view, the health and safety risks to workers and consumers, from currently available SPF systems, preclude the Company from marketing these products.

The DTSC's March 2014 Priority Product Profile of SPF contains a concise and accurate summary of the same risks associated with SPF systems that OC identified. The on-site manufacturing and installation processes for SPF present significant challenges in regulating these risks. OC is looking forward to participating in the formal rule making process, including providing alternatives to SPF systems in several applications. As an example, OC is currently developing a cost-effective, safe and highly sustainable fiberglass based solution for insulating un-vented / semi-conditioned attics that are frequently insulated with SPF. OC is actively working with California contractors, builders and building code officials to complete the product development process. We hope to share details of this new, innovative system with the DTSC during the Priority Products rule making process.

Sincerely,

A handwritten signature in black ink that reads "Frank O'Brien-Bernini".

Frank O'Brien-Bernini
VP, Chief Sustainability Officer
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