

Margerum, Mark T

From: Richard Duncan <rickduncan@sprayfoam.org>
Sent: Thursday, July 14, 2022 11:12 AM
To: Malinowski, Kerri
Cc: Richard Duncan
Subject: SPFA Request for Changes to LD 1503 (passed July 2021)

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Dear Ms. Malinowski,

The Spray Polyurethane Foam Alliance, or the "SPFA", is the educational and technical resource to the spray polyurethane foam industry, a national 501(c)6 trade association. Its 700+ members include spray polyurethane foam (SPF) insulation and roofing contractors, manufacturers, and consultants in all 50 states.

Regarding ME Bill LD 1503, the SPFA respectfully asks that the Maine Legislature reconsider the overly broad definition of PFAS chemicals and adopt an amendment that it will not include HFO (hydro-fluoro-olefin) blowing agents used in closed-cell SPF products. Changing the PFAS definition in ME LD 1503 as written can avoid the unintended environmental consequences caused by increased energy used for heating and cooling of residential and commercial buildings and will preserve hundreds of high-paying jobs for SPF industry across the state.

ME Bill LD 1503, passed as an emergency measure on July 2, 2021, regulates and will ultimately eliminate a wide range of products using PFAS chemicals. Specific to SPF, this regulation includes HFO blowing agents which are an essential ingredient for closed-cell SPF insulation and roofing materials. These HFO blowing agents are zero-ODP (ozone depletion potential) and possess low-GWP (global warming potential), enabling closed-cell SPF to achieve the highest R-value per inch of any commercially viable building insulation.

Not only does closed-cell SPF provide superior insulation performance, but it also seals the building enclosure against air leakage and controls damaging moisture to maximize energy savings and building durability, critical factors in lowering the carbon footprint of all residential and commercial buildings. In fact, when closed-cell SPF is considered in place of fiberglass insulation, it reduces the carbon footprint of a typical home in Maine over the life of the building¹ - equivalent to removing 24 automobiles from the highway for an entire year.

Overly broad definition of PFAS will restrict the use of closed-cell SPF resulting in closing of operations for these SPF contractors and put hundreds of highly skilled SPF installers out of work.

Should you have questions or would like more information about SPF insulation and roofing, please contact me.

1 - [Climate impact of plastics | McKinsey](#)

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