

Spray Polyurethane Foam Alliance Testimony on H.B.5100
An Act Concerning Safety and Certification Standards for the Spray Foam
Insulation Industry

Before the Connecticut General Assembly
General Law Committee

Legislative Hearing on
H.B.5100

February 18, 2014
1:00PM

Testimony Provided for the Hearing Record
Spray Polyurethane Foam Alliance (SPFA)
3927 Old Lee Highway, Suite 101-B
Fairfax, Virginia 22030

Before the Connecticut General Assembly
General Law Committee

Legislative Hearing on
H.B.5100

An Act Concerning Safety and Certification Standards for the Spray Foam Insulation Industry
To develop safety and certification standards for the spray foam insulation industry

February 18, 2014
1:00pm

Testimony Provided for the Hearing Record
Spray Polyurethane Foam Alliance (SPFA)
Fairfax, Virginia

1 The Spray Polyurethane Foam Alliance, or SPFA, is a 501c(6) not-for-profit trade association
2 whose mission is to advance the effective and safe use of spray polyurethane foam insulation
3 and roofing, or "SPF", by the professionals in our industry. SPF is used for the betterment of
4 structures pursuing high performance in the areas of energy efficiency, energy cost savings, and
5 occupant comfort. SPFA represents the value chain of the SPF industry with membership
6 comprised of nationwide professional contractors, distributors, equipment and material
7 manufacturers.

8 SPFA commends the state of Connecticut for considering a requirement for professional
9 certifications in this trade. The industry and SPF use for residential insulation has grown
10 considerably over the past decade due to strong demand for the product's performance.

11 To realize the performance claims the material must be installed correctly. The installation
12 process is one that utilizes specialized equipment and processes to install the SPF at high
13 temperatures and high pressure. While there are some products on the market, such as kits
14 and cans, or smaller and lower pressure SPF products that can be used in the DIY market, SPF
15 being used to insulate an entire building, or large portions of the building, at high pressure are
16 going to be installed by a professional .

17 There are many considerations a professional must take into account when installing SPF
18 ranging from, but not limited to, type of material appropriate for the job or requested by the
19 customer, building code compliance, correct Personal Protective Equipment (PPE),
20 manufacturer installation instructions dealing with topics such as installation temperature,
21 moisture content of the surface to be sprayed on, installed thickness to reach desired R-values,
22 and scheduling around the occupant's ability to depart the structure during the installation
23 period, whether they be the customer or possibly adjacent trades. Proper installation requires
24 a skilled and knowledgeable professional to manage all of the factors.

25 For this reason SPFA and its members recognize the need for certification. In 2012, the
26 organization embarked upon an effort to produce an upgraded world-class standards-
27 compliant, consensus developed professional certification program. This program, referred to
28 as SPFA PCP, achieved ISO-17024 compliance. This program was also subject to a courtesy
29 review by representatives of the U.S. Environmental Protection Agency (US EPA), the U.S.
30 Occupational Safety and Health Administration (US OSHA), the U.S. National Institute of
31 Occupational Safety and Health (US NIOSH), and other members of the Federal interagency
32 Task Force on SPF which SPFA has been working with closely for over four years.

33 This process was incredibly rigorous and allowed SPFA to offer a comprehensive certification
34 program that addresses all major considerations for a professional installer. The program is
35 split between insulation and roofing tracks, and each of those tracks have four levels of
36 certification representing Assistant, Installer, Master installer, and Project Manager. These are
37 increasingly challenging levels commensurate with the knowledge, skills, abilities and
38 experience of the candidate. Lower requirements are required to be completed before
39 obtaining certification at the higher levels. This is a progression that begins with the Assistant
40 level.

41 It is important to note that while SPFA strenuously encourages training, and offers training and
42 exam prep materials directly through SPFA and our member partners, the tests are available to
43 be taken without training. The ISO-17024 developmental process applies only to the testing,

44 and allows us to have high confidence that the tests are passable only by individuals qualified to
45 pass them. In addition to the written exams, significant secondary requirements must be met
46 to achieve the higher levels of certification, such as a Field Exam for the Master Installer, and
47 OSHA 10 and 30 hour cards.

48 The comprehensiveness of the program cannot be illustrated in the short time I have before
49 you today, but all of the checklists and process instructions are available on the SPFA website in
50 either the Insulation or Roofing PCP Handbooks.

51 Within the context of H.B. 5100, and its focus upon health and safety certifications, the SPFA
52 PCP Assistant level certification, the first level, is the most applicable, and also the most
53 accessible. This PCP certification level focuses almost solely upon chemical and jobsite health
54 and safety. This was a primary topic for SPFA, the federal agencies, partners, and customers, so
55 we made sure to cover it first. Additionally as a prerequisite for the SPFA PCP Assistant Level
56 certification, the candidate must also demonstrate completion of the American Chemistry
57 Council's (ACC) Center for the Polyurethanes Industry (CPI) online Health and Safety Training
58 module, referenced in the text of H.B. 5100.

59 A safe and proper installation is a good installation, and that begins with chemical and jobsite
60 health and safety.

61 The small American businesses that are SPF contractors have many challenges. The burden and
62 cost of obtaining professional certifications would likely and admittedly represent a near-term
63 obstacle for them, but possessing these certification would also be a method by which they
64 could distinguish themselves and their companies for their customers.

65 Should the state of Connecticut choose to pursue such certification requirements, SPFA stands
66 ready to assist in any respect where our PCP program may be referenced. It is important to
67 note, however, that due to the newness of this program SPFA would recommend an
68 implementation delay of approximately eighteen months from passage to allow SPF
69 professionals in the state to adjust their operations sufficiently to accommodate the new

70 demands and engage in the certification process. When SPFA testified before this body in
71 2013, almost one year ago to the day, our testimony referred to the PCP program as it was just
72 rolled out days prior at our 2013 annual convention and expo. In the first twelve months of the
73 program we have administered over 1300 exams nationwide, but to be fair to the professionals
74 in Connecticut a delay in implementation of this prospective law would be desired and
75 appropriate.

76 Thank you for the opportunity to speak with you here today. If the Chairman or any committee
77 members have questions I am happy to try to answer them today or in subsequent meetings.