



Center for the
Polyurethanes Industry

March 30, 2017

Transmitted Electronically to: Julia.Gress@dtsc.ca.gov

Dr. Julia Gress
Safer Products and Workplaces Program
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Re: Listing Spray Polyurethane Foam Systems with Unreacted Methylene Diphenyl Diisocyanates as a Priority Product (R-2016-04)– Comment Period Extension Request

Dear Dr. Gress:

On March 22, 2017, the Department of Toxic Substances Control (DTSC) issued its proposed *Listing Spray Polyurethane Foam Systems with Unreacted Methylene Diphenyl Diisocyanates as a Priority Product* rulemaking under the Safer Consumer Products (SCP) Program. Included in the rulemaking package were detailed technical and economic documents serving as justification for DTSC's action.

On behalf of the American Chemistry Council's Diisocyanates Panel¹ and Center for the Polyurethanes Industry,² I would like to request a 60-day extension to the comment period. An extension of the deadline from May 16, 2017 to July 14, 2017 is necessary to fully review the multiple detailed technical documents, and develop a response that is both constructive and meaningful to DTSC.

Please contact me if you have any questions. I can be reached at (202) 249-6604.

Regards,

Lee Salamone
Senior Director

cc: Meredith Williams, Deputy Director, Safer Products and Workplaces Program
Karl Palmer, Chief, Safer Products and Workplaces Program

¹ The Diisocyanates Panel is comprised of the manufacturers of MDI and TDI: BASF Corporation, Covestro LLC, The Dow Chemical Company, Huntsman Corporation and Wanhua Chemical (America) Co., Ltd.

² CPI's mission is to promote the growth of the North American polyurethanes industry through effective advocacy, delivery of compelling benefits messages demonstrating how polyurethanes deliver sustainable outcomes, and creation of robust safety education and product stewardship programs.

