



**October 8, 2018**

Ms. Marybel Batjer, Chair  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833-2936

**RE: OSFM Proposed Changes to CRC-Item 4, CBC-Item 17 & CCR: Flammability Standards for Building Insulation Materials (SUPPORT)**

Dear Ms. Batjer:

The California Professional Firefighters (CPF), state council of the International Association of Fire Fighters, representing over 30,000 career firefighting and emergency medical service personnel statewide, is pleased to support the California State Fire Marshal's proposal, "Flammability Standards for Building Insulation Materials," which is currently before the Commission for consideration.

This proposal would allow the below-grade use of polystyrene insulation without added flame retardants through changes in the California Building Code, California Residential Code, and California Code of Regulations.

When it burns, insulation treated with chemical flame retardants can create toxic smoke and cancer-causing combustion by-products -- dioxins and furans. Such exposures are associated with multiple cancers, including non-Hodgkin's lymphoma, acute myeloid leukemia, and brain cancer -- all of which occur at a higher rate in firefighters. Such elevated rates are believed to be caused by exposure to harmful chemicals during and after a fire.

According to Bryan Frieders, President of the nationally-recognized Firefighters Cancer Support Network:

*"As many as one out of every three firefighters may be diagnosed with cancer, and the evidence is overwhelming that they're getting it on the job."*

A report released by the California State Fire Marshal found that the fire performance of below-grade polystyrene insulation was not significantly different whether or not flame retardants were present. Thus, the addition of these chemicals to such insulation does not give additional protection to buildings or their occupants in the event of a fire.

Firefighting as an occupation involves many unpreventable risks, but the risk of toxic flame retardant exposure can be reduced, particularly when considering that the addition of flame retardants to polystyrene insulation does not provide a fire safety benefit.

We are firmly in support of the State Fire Marshal's code change proposal to allow builders the choice of whether or not to use flame retardants in below-grade polystyrene building insulation. This proposal could ultimately reduce firefighters' exposures to toxic chemicals and thus, reduce related occupational illnesses, without compromising fire safety.

**For these reasons, we urge the California Building Standards Commission to approve the OSFM's proposed changes to the Building Code to allow insulation below grade without flame retardants and protect firefighter health.**

Sincerely,



**Brian K. Rice**  
President

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**c:** Members, California Building Standards Commission  
State Fire Marshal Dennis Mathisen