



October 8, 2018

California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833-2936

**RE: Support for OSFM Proposed changes CRC-Item 4, CBC-Item 17 & CCR: Flammability Standards for Building Insulation Materials**

Dear Members of the California Building Standards Commission,

Health Care without Harm is writing to express our support for the California State Fire Marshal's proposal **"Flammability Standards for Building Insulation Materials,"** to allow the use of polystyrene building insulation without added flame retardants in below-grade applications.

Health Care Without Harm is an international organization committed to increasing sustainability in the health care sector. One of our goals is to maintain the health of people and the environment by reducing the use of harmful chemicals in hospitals and other facilities.

Extensive research has shown that adding chemical flame retardants to polystyrene insulation below-grade does not provide a significant fire safety benefit. Flame retardants used in building insulation have been associated with neurological and reproductive impairment, cancer, and ecosystem toxicity. These chemicals can adversely impact the health of those exposed during manufacturing, transportation, job site storage, installation, building demolition, and disposal (i.e., landfill, incineration, or recycling).

The State Fire Marshal's proposal is the result of a multi-year process to evaluate current flammability standards for building insulation. This Fire Marshal commissioned comparative fire testing of insulation with and without added flame retardants. Fire scientists at Oklahoma State University (OSU) found that the fire safety of below-grade polystyrene insulation was similar with and without flame retardants. **In other words, removing these toxic chemicals from insulation used below-grade would not create a fire safety hazard and would reduce human and environmental exposures throughout the product lifecycle.**

We believe that health care facilities should be healthy places and that staff, patients, and communities should not be unnecessarily exposed to potentially harmful flame-retardant chemicals. Updating California's building codes, as in this proposal, would allow health care institutions the option to use less toxic below-grade insulation.

We applaud the Office of the State Fire Marshal (OSFM) for proposing this code change and **urge the California Building Standards Commission to approve the OSFM's proposed changes to the Building Code.**

Sincerely,

A handwritten signature in blue ink that reads "Rachel L. Gibson".

Rachel L. Gibson  
Safer Chemicals Program Director  
Health Care Without Harm

CC: Chief Dennis Mathisen, Office of the State Fire Marshal