CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Safer Consumer Products Program
1001 I Street, 12th floor
Sacramento, CA 95812-0806

Project Title: Safer Consumer Products: Regulatory Responses for the Priority Product Spray Polyurethane Foam Systems with Unreacted Methylene Diphenyl Diisocyanate (MDI)

Project Location: Statewide

County: Statewide

Project Applicant: Department of Toxic Substances Control (DTSC)

Approval Action Under Consideration by DTSC: Issue Notice of Final Determination for Spray Polyurethane Foam (SPF) Systems with Unreacted MDI

Statutory Authority: Health and Safety Code division 20, chapter 6.5, article 14, sections 25252 and 25253

Project Description: In response to DTSC's listing SPF Systems as a Priority Product, SPF Systems manufacturers submitted an Abridged Alternatives Analysis report, which requires two mandatory regulatory responses and allows DTSC to impose additional responses as necessary to address the potential health impacts caused by use of SPF Systems. Following public notice and comment on three proposed regulatory responses and consultation with SPF Systems manufacturers, DTSC has finalized the determination. The three regulatory responses require the SPF Systems manufacturers to provide information about the hazard traits and safe use of SPF Systems to consumers, require training for all applicators of SPF Systems to ensure proper protections are utilized, and establish funding for grants to research and develop safer alternatives to SPF Systems. DTSC's Notice of Final Determination outlines all required regulatory responses and their implementation steps, as required by chapter 55 of division 4.5 of title 22 of the California Code of Regulations, section 69506.1.

Project Activities: DTSC requires that the manufacturers of SPF Systems implement the following regulatory responses (RRs) to continue to introduce SPF Systems into the stream of commerce in California. These RRs are necessary to protect the health of both professional and Do-It-Yourself (DIY) SPF Systems users or applicators.

1. Provide information to consumers and applicators in California (pursuant to section 69506.3 of title 22 of the California Code of Regulations). This RR requires specific information on the exterior of SPF Systems drums or on external product packaging, with further information on product websites and inside product packaging.

2. Implement training requirements prior to the sale of SPF Systems (pursuant to section 69506.4(e)). SPF Systems manufacturers must require purchasers of SPF Systems, or their agents, to provide attestations at the time of purchase of the product that applicators have or will have received training prior to use of the product.

3. Advance green chemistry and engineering by collectively funding grants to develop or make progress towards safer alternative(s) (pursuant to section 69506.8). SPF Systems manufacturers are required to fund a Green Chemistry Engineering and Innovation Fund.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Department of Toxic Substances Control

Exempt Status: Data Collection [14 CCR §15306], Educational or Training Programs Involving No Physical Changes [14 CCR §15322]

Reasons Why Project is Exempt: These regulatory responses require SPF Systems manufacturers to update and provide information for consumers on product packaging and websites, implement and track compliance with a training program for end users of the product and fund green chemistry and engineering grants for research and development of safer alternatives.

DTSC has no evidence of potential direct or indirect physical change to the environment that would result from the required two automatic regulatory responses that are triggered by the submittal of an Abridged Alternatives Analysis Report. In addition, for the requirement that responsible entities track and ensure that users receive online training, DTSC has no evidence that this regulation would result in a change in any of the physical conditions within California, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. DTSC received no comments during the public comment period for the Notice of Proposed Determination that indicated an adverse environmental impact from the proposed regulatory responses.

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Safer Consumer Products Program
P.O. Box 806, 1001 I Street, 12th floor
Sacramento, CA 95812-0806

Additional project information is available at https://dtsc.ca.gov/regs/.

Contact Person	Contact Title	Phone Number
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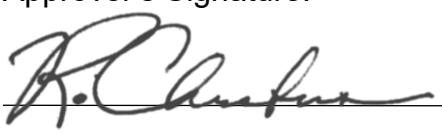
Approver's Signature:



Date:

October 23, 2025

Approver's Name	Robin Christensen	Approver's Title

Deputy Director, Safer Consumer Products Program

Approver's Phone Number
916-764-8443

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR: