

APPROVE RBI52-16 AS MODIFIED BY PUBLIC COMMENT

MYTH:

FOAM PLASTIC INSULATION WITHOUT FLAME RETARDANTS WOULD REDUCE FIRE SAFETY DURING TRANSPORTATION, STORAGE, AND CONSTRUCTION.

FACT:

Foamed polystyrene without flame retardants is already routinely manufactured, transported, and stored safely throughout the USA:

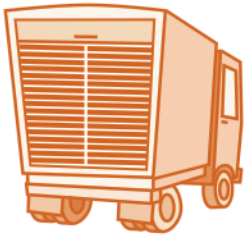
It is estimated that at least 40% of the North American polystyrene foam market in 2015 did not contain flame retardants.^{1,2}

We screened samples of 14 different kinds of polystyrene foam packaging and food service products from eight different brands, none of which were found to contain flame retardants.³



FACT:

Requirements for transportation and storage of foamed plastics with and without flame retardants are the same:



The U.S. Department of Transportation **does not restrict shipping** of such materials. Shipments from factories to regional distribution centers are done in fully loaded semi-trailer trucks.⁴



Other codes already include requirements for proper rack clearances and sizing of sprinkler systems for high-rack storage of foam plastics.⁵



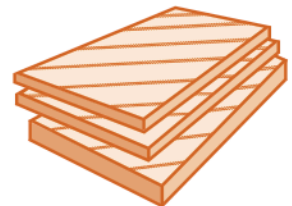
The Fire Code covers appropriate storage of foam plastic insulation on-site and considers a wide range of combustible materials.⁶

MYTH:

FOAM PLASTIC INSULATION WITHOUT FLAME RETARDANTS WOULD BE DIFFICULT TO IDENTIFY AND COULD POSE CHALLENGES TO INSPECTORS OR BE MISUSED.

FACT:

This proposal outlines clear requirements – **including height, color, and coverage of lettering** – for labelling of foam plastic insulation boards manufactured without flame retardants.



REFERENCES

- 1 Forman, C. (2015) *Polymeric Foams*. BCC Research, Report Code PLS008H. Accessed July 2016 through University of California Library.
- 2 Abt Associates. (2016) *Economic Analysis of the Final Rule to add HBCD to the List of TRI Reportable Chemicals*. Prepared for U.S. Environmental Protection Agency. Accessed 30 September 2016 at: www.regulations.gov/#!documentDetail;D=EPA-HQ-TRI-2015-0607-0220
- 3 See Reason Statement for RB152-16 As Modified. Available at: www.iccsafe.org/codes-tech-support/codes/code-development-process/20152017-code-development-group-b/
- 4 Personal communication, Pactiv Corp, June 2016.
- 5 e.g. International Fire Code (IFC) Chapter 32: High-Piled Combustible Storage
- 6 International Fire Code (IFC) Chapter 33: Fire Safety During Construction and Demolition and Chapter 35: Welding and Hot Work