Draft Regulatory Concept for Spray Polyurethane Foam Systems containing Unreacted Diisocyanates

Product description:
This Priority Product includes spray polyurethane foam (SPF) systems that contain any of the unreacted diisocyanates listed as a Chemical of Concern. The SPF systems are used in building structures for the purposes of insulation, roofing, filling and sealing of voids and gaps.

Related definitions:
Spray polyurethane foam systems:
Consist of unreacted or excess diisocyanates that have not undergone the reaction to produce the rigid foam or coating, sealant or adhesive for use with rigid foam. These systems may be one-, two-, or multi-component systems in drums or cans.

Unreacted diisocyanates:
In two-component SPF systems, unreacted diisocyanates are mixed with polyols and other chemicals and undergo chemical reactions to produce the foam, which then undergoes further processes to become rigid foam.

In one-component systems, unreacted diisocyanates may be in excess in premixed cans. Excess diisocyanates in these systems diminishes as these products harden after application to become the rigid foam.

Chemicals of Concern:
- Generic Methylene diphenyl diisocyanate (MDI) mixed isomers, CAS RN: 26447-40-5
- 4,4’-methylene diphenyl diisocyanate, CAS RN: 101-68-8
- Toluene Diisocyanates, mixed (TDI), CAS RN: 26471-62-5
- 2,4-Toluene diisocyanate, CAS RN: 584-84-9
- 2,6-Toluene diisocyanate, CAS RN: 91-08-7
- Hexamethylene-1,6-diisocyanate (HDI), CAS RN: 822-06-0