



DEPARTMENT OF FORESTRY AND FIRE PROTECTION
OFFICE OF THE STATE FIRE MARSHAL
FIRE ENGINEERING AND INVESTIGATIONS

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Date: May 30, 2024

To: Flame Retardant Committee Members

From: Patricia Setter Deputy State Fire Marshal III

SUBJECT/AGENDA ACTION ITEM:

Ban for the processing and distribution of certain PIP (3:1)-containing articles, and the PIP (3:1) used to make those articles, until October 31, 2024. These are Flame Retardants used to make some PVC materials.

Recommended Actions:

Information Only.

Background Information:

Phenol, isopropylated phosphate (3:1) (PIP (3:1)) (CAS registry no. 68937-41-7) is a **phosphate compound with three isopropylated phenyl groups**. It is used as a plasticizer or flame retardant in polyvinyl chloride (PVC), polyurethane, and other plastic materials.

In 2022, the U.S. EPA extended the [enforcement and notification period](#) for the processing and distribution of certain PIP (3:1)-containing articles, and the PIP (3:1) used to make those articles, until October 31, 2024. There is a wide range of products that will fall into this action, especially plastic articles that are components of electronics or electrical articles. This can range from musical instruments, plastics, appliances, motor vehicles, building materials, and more. There are some use categories that are exempt such as recyclables, aerospace, marine, sealants and adhesives (sealants and adhesives only until January 6, 2025) and some military applications. The ban applies to manufacture (including import), process, distribution, or use phenol, isopropylated phosphate (3:1) (PIP (3:1)), or PIP (3:1)-containing articles.

Analysis/Summary of Issue:

This may require excessive audit of the Flame-Retardant PVC materials prior to October 31, 2024.

Analysis/Summary of Issue:

Potential Industry Impacts:

This ban may impact our PVC materials, until the audit is completed the impact is unknown.