

Comments on Criteria AC12.

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Comments:

I have no objection to the intent of the proposal to change the QC requirements for XPS to compressive strength only. This is a similar change to the recent change for EPS testing. However, the revisions to 4.5.15.1.3 appear to have been further revised beyond this intent. XPS is manufactured in a number of ASTM C578 ?Types? and the verification of this by the inspection agency should be included in this section. Alternatively the sentence ?Over time, the testing shall incorporate tests to address all types and resin grades? be deleted from the EPS sentence. I think the intent of the AC is to require ongoing confirmation of the testing of the various Types for both EPS and XPS products. The above comment also applies to section 4.5.15.2.3. The proposed report requirement for water vapor permeance in Section 6.6 is unnecessary. The reports on these products already state that they comply with ASTM C578. There is no reason to specifically isolate water vapor permeance over the other properties in ASTM C578. If a specific manufacture wants to extend the information beyond the R-values (obviously necessary to code compliance) in there report, ICC-ES should accommodate this as they have already verified compliance with ASTM C578.



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Mr. Michael Beaton
Senior Regional Manager
5360 Workman Mill Road
Whittier, CA 90601-2298

Re: Alternative Criteria Development Process—Acceptance Criteria 12 (AC 12)

Dear Mr. Beaton:

The Extruded Polystyrene Foam Association (XPSA)¹ is writing to update its letter, dated July 18, 2008 to clarify why we requested the proposal and why think we think it should be granted.

Our request to eliminate the requirement to test for flexural strength is based on the different manufacturing processes used to create expanded polystyrene (EPS) and extruded polystyrene (XPS) foam. When EPS is produced, the most important factor for its physical property performance is the fusion of the beads during molding. As the EPS industry advocated, EPS performance is best addressed by a flexural strength test rather than a compressive strength test. XPS has a very different manufacturing process. During the extrusion process there is no fusion of beads taking place. Rather, extruders blend in the blowing agent and FR independently instead of it being a function of the resin as is the case with EPS molding. Thus, the XPS manufacturing process yields a different product that forms a natural skin on its surface. As a consequence of these differences, the compressive strength for XPS is a much better measure of potential performance than is flexural.

Currently, the EPS industry only tests for flexural strength and not compressive, which is the most appropriate indicator for potential performance for their manufacturing process. Similarly, XPSA is asking for recognition and relief of flex-test requirements because the use of compressive strength is a much better indicator for its products than flex.

Respectfully submitted,

Susan Strong, Executive Director

Cc: XPSA Board of Directors and Building Codes Task Force

¹ The Extruded Polystyrene Foam Association (XPSA) is a trade association representing manufacturers of Extruded Polystyrene Foam (XPS) insulation products and the industry's raw material suppliers. XPSA members include The Dow Chemical Company, Owens Corning, and Pactiv Corporation, which collectively manufacture more than 95 percent of all XPS insulation products sold in the North American market. XPSA conducts industry-wide research; addresses regulatory and legislative challenges; and serves as the industry spokesperson to promote the benefits that accrue to society from appropriate use of XPS foam insulation applications.