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May 19, 2009

Mr. Michael Beaton, P.E.
Senior Vice President
ICC Evaluation Service, Inc.
5360 Workman Mill Road
Whittier, CA 90601

Re: Proposed Revisions to the Acceptance Criteria for Foam Plastic Insulation, Subject AC12-0609-R1 (MB/SF)

Dear Mr. Beaton:

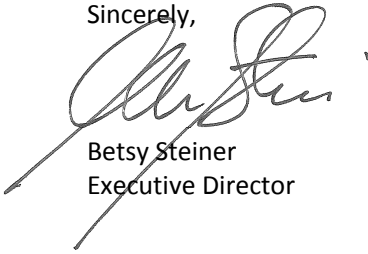
On behalf of the EPS Molders Association (EPSMA), we are submitting the following comments to the current proposal to change AC12 Section 4.5.11.5 "Foam Plastic Used in Attic and Crawl Spaces". We believe these comments deal with several inconsistencies that should be addressed.

1. In the body of AC12, all test requirements and limitations have been removed, instead referring to Appendix A or B. The proposed revision to Appendix A states that after June 1, 2010, compliance with Appendix B will be required, implying the options currently indicated within Appendix A will no longer apply. Appendix B includes ONLY the test requirements for a COMPARATIVE test. Therefore, sections A1.0-A1.2.1.1 and A2.0-A2.2.1.1 MUST not expire on June 1, 2010. It is only in these sections of AC12 where the code prescribed NON-COMPARATIVE testing options for attics and crawl spaces. If it is ICC-ES' intent to disallow the special use testing prescribed in 2009 IBC Section 2603.9 or 2009 IRC Section 316.6, rationale should be presented. The original understanding of the motives for the Appendices was to clarify COMPARATIVE alternatives available. Perhaps the code prescriptive testing and limitations should be moved OUT of Appendix A, and reinserted into the BODY of AC12. Alternatively, the following revision should be made to the preamble in Appendix A: "Alternative test procedures in Sections A1.2.3 and A2.2.3 will expire effective June 1, 2010. After that date, compliance with Appendix B provides the only alternative testing options."
2. In Appendix B, Section B1.0, Scope, please delete "(SPF)" from the first sentence, as SPF foam is covered in AC377 and need not be specified in AC12.
3. In Appendix B, Section B2.1.1, Specimen Mounting, the first sentence describes that the specimens may be mounted in either of two configurations. However, the last two sentences of this section allow for only one configuration, walls AND ceilings. To be consistent with the full scope of the Appendix and to allow testing "in the manner intended for use" (from IBC and IRC), this should be edited as follows: "The insulation shall be applied to the three test walls and/or the test ceiling. If a coating is used over the insulation, it shall be applied to ~~both~~ the walls and/or the ceiling at the same minimum thickness or coverage intended for use."
4. In Appendix C, Section C1.0, Scope, includes the following: "...is acceptable for use in attic or crawl space areas..." Since the Appendix and the test room configuration is specifically for crawl space testing, the "attic or" should be edited out.

In addition, we would like to make note that due to the short timeframe available to conduct testing on EPS using the proposed test method, EPSMA may have further comments upon evaluating how the test procedure performs in practice.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Steiner". The signature is written in a cursive style with a long, sweeping underline that extends to the left and then curves back under the name.

Betsy Steiner
Executive Director



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Senior Vice President
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5360 Workman Mill Road
Whittier, CA 90601 United States

Re: Proposed Revisions to the Acceptance Criteria for Foam Plastic Insulation, Subject AC12-0609-R1 (MB/SF)

This letter provides comments on proposed revisions to AC12, Acceptance Criteria for Foam Plastic Insulation.

With regard to item 2 in the ICC-ES cover letter, I believe the change referenced in section 3.4.3, Exception 3 was intended to revise the maximum water vapor permeance for ASTM C 578, type IV to 1.5 perms ($86 \text{ ng/Pa}\cdot\text{s}\cdot\text{m}^2$) when data is submitted. This would be consistent with the revision incorporated into the C 578-08 version for Type IV and the October 2008 Dow submission.

With regard to item 4 in the ICC-ES, the revision within the body of AC12 encompassed deletion of requirements and limitations applicable to foam plastic used in attics and crawl spaces. The deleted acceptance criteria limitations within AC 12 were moved to Appendix A, sections A1.2.2.1 for use in attics and A2.2.1.1 for use in crawl spaces. Since Appendix A will be deleted effective June 1, 2010, these limitations will need to be added back into the body of AC12 or be incorporated into Appendix B.

Also, the code prescriptive test options in the body of AC12 were moved to sections A1.2.1 and A2.2.1. With the deletion of Appendix A, these options will need to return into the body of AC12.

With regard to the proposed Appendix B requirements, the following comments are offered:

1. Reference to SPF in section B1.0 should be deleted as this product has been moved to AC377.
2. Section B2.1.2 indicates test specimens can be mounted in either of two configurations. In order to maintain the intent to permitting options of qualifying foam plastic for application to walls only, ceilings only or both dependent upon intended end use, the last sentence in this section should be revised in two locations to indicate "walls and/or ceiling".
3. The EPS industry was made aware of the proposed test requirements in Appendix B within the last 60 days. I am aware that the EPS industry has scheduled preliminary testing for compliance with the requirements of Appendix B, but would like to reserve the option to provide additional comments on the acceptance criteria in Appendix B after completion of testing.

I appreciate the opportunity to provide comment on the proposed revisions. Should you have any questions regarding my comments, please contact me at your convenience.

Sincerely,

Jim Whalen, P. Eng.
Technical Marketing Manager
PFB Corporation