

Comments on Criteria AC377.

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Comments:

Subject: Proposed Revisions to the Acceptance Criteria for Spray-applied Foam Plastic Insulation, Subject AC377-1009-R1 (SF/MB) Si Farvardin
October 1, 2009 letter requesting public comments to proposed wording submitted by Flame Seal Products, Inc. Preferred Solutions, Inc. supports the proposed wording submitted by the Dow Chemical Company on October 26, 2009 which achieves two key clarification objectives. 1. Making it clear that exposed foam is compliant with AC377 if the tested exposed foam complies with the appropriate performance criteria of the tests specified in Section 3.3.3 2. Include in the ESR the maximum thickness of foam and minimum thickness of coatings (if any) that comply with AC377 based on thicknesses successfully tested.



200 LARKIN CENTER
October 26, 2009

The Dow Chemical Company
Midland, Michigan 48674

Si Farvardin
ICC Evaluation Services, Inc.
5360 Workman Mill Road
Whitter, CA 90601

PROPOSED CHANGES TO ICC-ES ACCEPTANCE CRITERIA AC-377

Mr. Farvardin,

We are writing to respond to the proposed changes addressed in ICC-ES letter dated October 1, 2009 subject, "Proposed Revision to the ICC-ES Acceptance Criteria for Spray-applied Foam Plastic Insulation Subject AC377-1009-R1 (SF/MB)." Dow Chemical agrees with and applauds the effort to clarify this section of the acceptance criteria, but we have a concern on the proposed wording.

If an assembly with exposed foam (foam with no covering or coating) passes the testing described in Section 3.3.3 of AC-377, then that assembly can be used as tested, i.e. foam exposed. As currently written, the proposed AC-377 language excludes this type of an assembly. The proposed wording says:

"..... an assembly consisting of the foam plastics insulation and any coatings or coverings."

When testing to qualify a foam plastic assembly for use without the thermal barrier and foam plastic assembly has passed the room corner testing with the foam left exposed, there would be no need for a covering or coating. Thus we offer the following modification to the proposed wording:

"..... an assembly consisting of exposed foam plastic insulation or foam plastic insulation and any coatings or coverings."

Also for further added clarity, we support providing the code report user more information on the assembly tested. We propose adding in the following language:

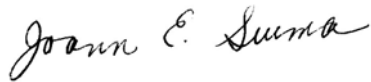
"When testing is in accordance with Section 3.3.3, the evaluation report shall include the following information:

- a. The foam plastic insulation is limited to the maximum thickness and density tested.
- b. The installed coverage rate or thickness of the coatings or coverings, if part of the insulation system, shall be equal to or greater than that which was tested."

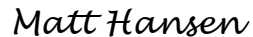
In summary, Dow Chemical supports the changes to AC-377, but offers an alternative to include all options for foam plastic assemblies use without a thermal barrier and additional code report language to clarify the assemblies tested.

We are happy to discuss this with you or other ICC-ES staff. Please give either of us a call with any questions.

Sincerely,



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cc. Michael Beaton, ICC-ES

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Si Farvardin
ICC Evaluation Services, Inc.
5360 Workman Mill Road
Whittier, CA 90601

October 30, 2009

Subject: Proposed Revision to the ICC-ES Acceptance Criteria AC-377.

Dear Mr. Farvardin,

We are writing in response to the proposed changes described in and ICC-ES letter dated October 1, 2009 regarding “Proposed Revision to the ICC-ES Acceptance Criteria for Spray-applied Foam Plastic Insulation Subject AC377-1009-R1 (SF/MB).”

SPFA agrees that clarification of the acceptance criteria is needed and suggests a minor change to the wording to better define the assembly referenced in Section 3.3.3. The currently proposed wording says:

***3.4.3 Thermal Barriers for Spray-applied Foam Plastics as Nonstressed Elements in Walls and Ceilings:** As an alternative to covering the foam plastic with a thermal barrier complying with IBC Section 2603.4 and IRC Section R314.4 or UBC Section 2602.4, an assembly consisting of the foam plastic insulation and any coatings or coverings may be qualified by the room corner tests described in Section 3.3.3.*

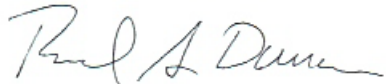
If an assembly with an uncovered/uncoated (exposed) foam plastic passes the test according to the requirements of Section 3.3.3 of AC-377, it is implied that this assembly can be used as tested, i.e. foam exposed without covering or coatings. It is not clear that the current or proposed language of AC-377 permits the use of an exposed foam assembly. To make this clearer, we suggest the wording be modified as follows:

***3.4.3 Thermal Barriers for Spray-applied Foam Plastics as Nonstressed Elements in Walls and Ceilings:** As an alternative to covering the foam plastic with a thermal barrier complying with IBC Section 2603.4 and IRC Section R314.4 or UBC Section 2602.4, an assembly consisting of either the exposed foam plastic insulation or the foam plastic insulation and any coatings or coverings may be qualified by the room corner tests described in Section 3.3.3.*

In conclusion, SPFA supports the changes to AC-377, but suggests that these changes explicitly permit the use of exposed foam assemblies.

Should you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard S. Duncan". The signature is written in a cursive style with a long, sweeping underline.

Richard S. Duncan, Ph.D., P.E.
Technical Director