

Comments Via E-Mail From Ed Minch, Energy Services Group

I believe that the new standard of 6 CFM25/100 ft² duct leakage to the outside is asking a lot. Look at the New Jersey Energy Star Program, and you will see that this is a major sticking point despite there being crazy-big rebates involved. They have a target guideline of 5% of total system flow as leakage to the outside, with a requirement of less than 10%, and they also require mastic only as a sealant. Despite 4 years of involvement in the program, it is still difficult to consistently reach this 10% number for some builders. Call Rick Marx of EAM at 732-556-9190 for more discussion.

The requirement for 9 CFM/100 ft² total leakage in a duct system completely inside the building is excessive. If the building is already tight, then that leakage has no place to go but in the building. If your goal is comfort, then a look at total flow and balancing would be more appropriate. This would be the first time I have seen any standard that included this requirement.

The basic approach of using leakage per square foot instead of leakage per ton of A/C is unfair to those living in warmer climates. A house in New York might have a 2-1/2 ton A/C unit, an identical house here in Delaware might have a 3 ton unit, and an identical house in South Carolina might have a 3-1/2 ton unit. Each must have the same leakage per square foot, making the larger duct system in South Carolina proportionally tighter because it has more length of seam and crack, larger take-offs and boots, and generally more leakage potential that must be addressed. Alternatively, leakage per ton would have all three systems sealed to the same level.

On the timing of the proposal, I would like to see a longer allowable time for builders in the middle of a project. One consistent criticism that we have heard is that utility energy programs would change or end just as a builder was getting cranked up to meet the standards. Perhaps a Jan 1, '07 start date for projects started before Jan 1, '06 would give builders a little time to not have standards change in the middle of a project.