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1	EPA Response to Stakeholder Comments on Proposed Insulation Specification - 2nd Round	
2	Comment Summary	EPA Response
3	One respondent stated that they did not support the use of the term "Mass Insulation" and suggested using the term "Insulation Products."	EPA agrees and has removed the term "mass insulation" from the document.
4	One respondent asked for clarification regarding why EPA allows for the insulation component of an ICF to be labeled, but does not allow the insulation component of a SIP (Structural Insulated Panel) to be labeled.	EPA will allow manufacturers of the insulation portion of a SIP to participate in Seal and Insulate with ENERGY STAR Program. Insulation products may utilize the Seal and Insulate with ENERGY STAR educational graphic as long as the insulation meets one of the insulation product definitions and all of the testing requirements. The foam portion of a ICF assembly is called out specifically because these are special foam molds designed specifically for building SIP walls and are also insulation. For both SIPs and ICFs there are no clear consensus test standards available (such as ASTM) to test the R-Value of the whole assembly. EPA may reconsider allowing SIPs manufacturers to participate once a consensus is arrived on testing protocols.
5	One respondent raised concern that the EPA is requiring more testing and costly certification requirements for manufacturers, and that they currently already comply with existing regulations.	EPA does not agree and is not proposing more tests or regulations beyond what is currently required in the FTC's insulation regulations and in the building code (IRC) regarding these products. The main new requirement is that product's tests must be third-party certified which is an ENERGY STAR program wide change across all product types. This additional requirement is being added in order to enhance the validity and credibility of the ENERGY STAR brand. ENERGY STAR is a voluntary program and insulation manufacturers are not obligated to participate in the program.
6	One respondent requests the acceptance of NVLAP laboratory test results.	EPA agrees that NVLAP labs may participate in this program as long as the lab meets the program lab accreditation requirements in the Application for Recognition of Insulation Certification Bodies [ILAC MRA ISO/IEC17011 and 17025 requirements] and as long as the Certification Body (CB) reviewing the data accepts the accreditation of that lab in their program.
7	One respondent requested there be no third party verification.	EPA is not proposing to include third-party verification for insulation products. EPA is proposing that insulation products or product lines (families) be third-party certified to participate in the program.
8	One respondent asked where EPA will expressly state that third-party certification of test results by a certification body is requirement.	The requirement to participate in third-party certification will be addressed in the Partner Commitments, which partners will be required to sign in order to participate in the program.

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9	<p>Multiple spray or pour foam manufacturer stakeholders commented that they do not currently supply specific cure and reentry times for workers, homeowners etc. because these times depend greatly on the humidity level and temperature of the location in which the foam is being applied. Additionally, manufacturers supply a link to CPI's Health and Safety Guidance for Spray Polyurethane Foam (SPF) Contractors/Building and Construction Professionals for such guidance at http://www.spraypolyurethane.org/Main-Menu-Category/Professional-Contractors/Health-and-Safety-Guidance/default.aspx</p>	<p>EPA has reviewed the American Chemistry Council's Center for the Polyurethane Industry Health and Safety Guidance for Spray Polyurethane Foam (SPF) Contractors/Building and Construction Professionals. While there is good information on the site, the website clearly refers homeowners to the manufacturer or contractor and the contractors to the manufacturers for the re-entry or re-occupancy times. Therefore, for this voluntary ENERGY STAR Program, EPA will require that participating manufacturers provide re-entry or re-occupancy times or tables or range of times to ensure that guidance from manufacturers recommended in CPI documents is being made available to the public.</p>
10	<p>One respondent recommended that in regards to reflective insulation, the reflective air space when behind vented cladding should not be claimed as air infiltration discounts any possible R-value gain and does not meet ASHRAE Handbook guidelines.</p>	<p>EPA already specifies that reflective insulation products are only eligible if "marketed for installation within an enclosed wall or similar cavity". EPA's intent is to not label products that claim an R-value for installation in a ventilated or non-enclosed space.</p>
11	<p>One respondent asked for clarification as to whether in the case where there is a change in the test procedure at the end of a review cycle, that re-testing is automatically required. The respondent suggested that instead the third-party certification body should be able to evaluate whether the changes effect the results and provide a no-change allowance.</p>	<p>EPA's intent is to have the Certification Body (CB) re-issue a CB report each three year cycle. At that time, the CB will evaluate whether there have been changes to the test procedures, codes, or the product (note that changes to the product must be reported immediately to the CB) and update the CB report accordingly. The CB will evaluate if the changes to the test procedure would effect the result of the test, and if so, retesting using the latest test procedure would be required. Otherwise, the CB would not require re-testing of the product. Also, if codes have changed, the CB must re-evaluate whether those changes effect the compliance of the product to ENERGY STAR requirements when the product comes up for re-evaluation.</p>
12	<p>One respondent suggested that under the description of spray or poured foams that it would be more inclusive to list "aminoplast" foams as opposed to "phenolic" foams.</p>	<p>All product definitions include the statement "included but is not limited to" prior to listing possible materials. Therefore, it is not intended as an exhaustive list, and if materials are not expressly listed, that is not an indication that the product is excluded.</p>
13	<p>Multiple respondents requested clarification as to whether low volume spray foam is an included product under the new program requirements.</p>	<p>EPA's intent is to promote whole wall, floor, and ceiling insulation products, and low volume spray foam products do not fall under that umbrella. In addition, these products are usually used for air sealing, and EPA is targeting products primarily used as residential insulation. For further clarity, EPA has added the following language to the Excluded Products section: "Smaller volume single or two-part foam used primarily for air sealing and not intended for full floor or wall insulation applications."</p>

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14	One respondent suggested adding polyisocyanurate in place of or in addition to polyurethane.	EPA agrees and has added polyisocyanurate to the list of materials mentioned in the Board Insulation definition. The definition includes the statement "included but is not limited to" prior to listing possible materials. Therefore, it is not intended as an exhaustive list, and if materials are not expressly listed, that is not an indication that the product is excluded.
15	One respondent mentioned that Section 3A could be in conflict with significant digit and rounding requirements in the referenced standards.	EPA understands that there may be rounding guidance in the test procedures, and therefore added the statement "Unless otherwise specified herein or in the test procedure, compliance with eligibility limits shall be evaluated using exact values without any benefit from rounding." EPA also added a clarifying statement that for purposes of evaluating a product for its compliance with the minimum R-value of 3.0, in alignment with FTC regulation requirements, the value must be rounded to the tenths place.
16	One respondent informed EPA that there are surface burn exceptions in the IRC for certain products, and suggested that EPA not require ASTM E 84 testing on these non-rated products.	EPA has added a clarifying statement to the specification that allows exemptions to surface burn characteristic testing if they are exempted in the IRC. It will be the responsibility of the Certification Body to grant these exemptions.
17	Several respondents commented on the reference to ICC-ES AC 12 for conditioning procedures. Respondents clarified that AC 12 is for foam plastic Insulation other than spray applied foam plastics, and spray applied foam plastics are covered by AC 377.	EPA agrees with the clarification and has included conditioning procedures referencing ICC-ES AC 377 for Spray or Pour Foam and ICC-ES AC 12 for Rigid Board Insulation.
18	One respondent explained that flame spread index can be determined using either ASTM E-84 or UL 723 and that both standards should be referenced.	EPA has included both ASTM-84 and UL 723 as acceptable test standards for surface burn characteristic testing.
19	One respondent suggested that the note on ASTM E 84 be removed since ASTM E 84 contains mounting guidance already.	EPA agrees with the comment and has removed the reference to mounting guidance as suggested.
20	One respondent asked that EPA be more specific with ASTM E-84 test and list, for example, ASTM E84-09 or E84-10.	EPA disagrees and did not provide dated versions of the test procedures and instead requires the latest test procedure be utilized. EPA will allow older versions of a test being used if the CB determines that the test does not deviate significantly from the most up-to-date test procedure in a way that affects the results.
21	One respondent suggested that radiant barriers and reflective insulations be mounted according to ASTM C-2599.	EPA agrees and points out that the ASTM E84 standard already references the mounting methods of ASTM C-2599.
22	One respondent suggested eliminating the date at the end of the ASTM E 408 so it does not include "71".	EPA agrees with the suggestion and will adopt the correction.
23	One respondent requested removing the reference to "GSA Specification HH-I-530A" because both HH-I-530-A and HH-I-530B are no longer active standards.	EPA recognizes the GSA specification may no longer be active, but intends to mirror the current language specified by the FTC. EPA will accept equivalent alternatives that might be available and has referenced AC 12 and AC 377, but other methods may be acceptable as per the CB's evaluation.

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24	Multiple respondents expressed concern that insulation of variable installed thickness cannot be tested at all the thicknesses intended for sale because test standard apparatus have thickness limitations.	EPA agrees that this is an issue that should be addressed and has included the following language based on ICC-ES AC 377: "For products having variable installation thicknesses, such as Spray or Pour Foam Insulation and Loose-fill Insulation, samples shall be tested at both a 1-inch (25.4 mm) thickness and at the maximum thickness permitted by the test procedure, but at not less than 3.5 inches (88.9 mm)."