



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

Climate Protection Partnerships Division  
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Washington, DC 20460

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Dear ENERGY STAR® Insulation Stakeholder:

After the initial release of the 'Seal and Insulate with ENERGY STAR' Program Definitions and Testing Requirements Version 1.0 and Partnership Commitments in September of 2011, the U.S. Environmental Protection Agency (EPA) released a draft clarification for stakeholder review on January 23, 2013 proposing minor modifications.

EPA thanks stakeholders for their submissions during the comment period that ended on February 8, 2013. EPA has incorporated into the final documents several clarifications that will not impact the terms of the partnership agreement and will continue to have only minor impacts on certification testing of a few product types. As such, EPA has elected to track this latest version by a revision date (Rev. Mar-2013) rather than issue a full revision.

The following modifications have been adopted into the final Definitions and Testing Requirements Version 1.0 (Rev. Mar-2013):

Final modifications to the Definitions and Testing Requirements

- Modified the Board Insulation definition to state semi-rigid "or rigid" insulation to clarify that products such as expanded polystyrene, extruded polystyrene, or polyisocyanurate, which are commonly considered rigid, are included in the scope.
- Changed the definition for Structural Insulated Panel (SIP) to refer to the ANSI/APA PRS 610.1 draft standard definition. This corrects the previous assumption that SIPs are always filled with spray foam and commonly are assembled with a rigid board core.
- Removed Section 2.B, "Surface Burning Characteristics Criteria", under "Testing Requirements," to avoid redundancy.
- Added Section 2.B.a.2.ii to specify loose fill insulation sample thickness requirements, which aligns with the Federal Trade Commission (FTC) 16 CFR 460 language for representative thickness.
- Removed Section 1 "Testing Temperature" under "Product Type 2 – Reflective Insulation (Single Sheet System): R-Value Test Requirements" and added to the "Calculating R-Value" section that when referring to the American Society of Heating, Refrigerating, and Air-Conditioning Engineers' (ASHRAE) Fundamentals Handbook, use the R-value shown for 50° F, with a temperature differential of 30° F to align with the Federal Trade Commission (FTC) 16 CFR 460.
- Changed Section 5 under "Product Type 3 – Reflective Insulation R-Value (Multiple Sheet System): R-Value Test Requirements" to remove the requirements for reporting the R-value for each air space to align with the Federal Trade Commission (FTC) 16 CFR 460.
- Corrected the section title for "Product Type 4" on pg. 7 to "Reflective Facing" rather than "Foil Facing", to align with the product definitions on pg. 2.
- Corrected the numbering format under Section 3.
- Added CAN/ULC S102.2, "*Method of Test for Surface Burning Characteristics of Flooring, Floor Coverings, and Miscellaneous Materials and Assemblies*" as an accepted test method for surface burning characteristics.

Final modifications to the Partnership Commitments

- Corrected a reference in Section 9.2 for the relevant FTC code (from 16 CFR 260 "Labeling and Advertising of Home Insulation" to 16 CFR 460 "Labeling and Advertising of Home Insulation".)

Timeline

EPA has finalized clarifications to the Version 1.0 and Partnership Commitments, and this revised criteria immediately replaces the September 2011 version.

Please contact [insulation@energystar.gov](mailto:insulation@energystar.gov) if there are any additional questions concerning these changes. Thank you for your interest and participation in the Seal and Insulate with ENERGY STAR program.

Sincerely,

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Seal and Insulate with ENERGY STAR