

DOCKETED

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Spray Foam Coalition Comments on 2016 Res Compliance Manual and Documents

Additional submitted attachment is included below.



Center for the
Polyurethanes Industry

July 31, 2015

Sent via Email

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814
DOCKET@energy.ca.gov

**RE: Docket #15-BSTD-02
2016 Residential Compliance Manual and Documents**

Dear California Energy Commission,

The Center for the Polyurethane Industry's Spray Foam Coalition¹ ("SFC") submits the following initial comments to the California Energy Commission ("CEC") regarding the draft 2016 Residential Compliance Manual and Documents ("Compliance Manual").

Upon review of the Compliance Manual, the SFC believes there are several omitted references to spray polyurethane foam ("SPF") in the current text. The SFC will provide the CEC with a comprehensive list of omissions and recommended changes upon completion of a thorough review of the Compliance Manual.

Initially, we have identified the subjects below in Chapter 3 of the Compliance Manual:

- Page 5: Definition of conditioned space;
- Page 82: Reference to below deck insulation;
- Page 93: Omission of SPF in Figure 3-30;
- Page 103: Omission of diagram/information for unvented attics;
- Page 128: Incomplete SPF thickness table; and
- Page 135: Quality Insulation Installation information.

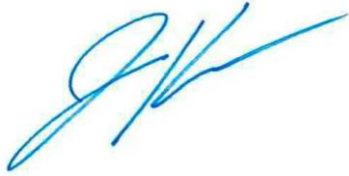
The SFC believes that addressing these subjects with additional information or revisions will make the final Compliance Manual a more complete and accurate resource for the construction industry.

¹ The Spray Foam Coalition (SFC) champions the use of spray polyurethane foam in U.S. building and construction applications and promotes its economic, environmental and societal benefits while supporting the safe manufacture, transport, and application of spray polyurethane foam. SFC consists of manufacturers of spray polyurethane foam systems as well as suppliers of raw materials and machinery used to apply the foam.



We look forward to addressing these topics with CEC staff. In the interim, please do not hesitate to contact me at Justin.Koscher@americanchemistry.com, (202) 241-6617, or Rick Duncan, rickduncan@sprayfoam.org, (410) 920-9920, with any questions.

Kind regards,



Justin Koscher, Director
Center for the Polyurethanes Industry
Spray Foam Coalition

