

**DOCKETED**

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*Comment Received From: Tien*  
*Submitted On: 8/3/2018*  
*Docket Number: 18-BSTD-02*

## **Update R-value ICF products on CEC Appendix**

The National Ready Mixed Concrete Association (NRMCA) would like to submit updates to the 2019 Reference Appendices Table 4.3.13 “Thermal Properties of Insulating Concrete Forms by providing current thermal performance values for the foam being used in the wall assembly. I have attached a PDF version of the updated Table 4.3.13 which shows the edited U-factors, R-values, notes and assumptions highlighted in yellow. I have also attached supporting documents that show the calculations for the updated values and the ASTM C578 Type II EPS R-value per inch test data. Along with updating the tables values we would also like to submit updates to the 2016 Residential and Nonresidential Manuals to provide clarifying descriptions and photos of ICF construction. The attached Word document shows the existing language along with the proposed residential and nonresidential language for the compliance manuals. For the Residential Compliance Manual we would like to replace the existing language with the attached updated language. With the Nonresidential Compliance Manual we would like for the ICF description to be located after section 3.5.1 which will be similar to how it is presented in the Residential Compliance Manual.

This application comment was submitted previously and we were informed that the CEC is limited to using the minimal listed R-value that is shown the Bureau of Home Furnishings and Thermal Insulation directory (which are below the R-4 value noted here). The request is to decouple the CEC Appendix from the Bureau’s directory or have the Bureau take steps to update their out-of-date directory.

Thank you for the opportunity to participate in the 2019 Standards Rulemaking and for the consideration of our comments.

Tien Peng  
Vice President of Sustainability Codes and Standards, NRMCA

*Additional submitted attachment is included below.*

Table 4.3.13 – Thermal Properties of Insulating Concrete Forms

Insulation Type	Insulation Thickness Per Side (Total R-Value)	Performance Factor		Flat <sup>1</sup>					Waffle Grid <sup>2</sup>		Screen Grid <sup>2</sup>
				Concrete Core Thickness (inches)					6	8	6
				4	6	8	10	12			
A	B	C	D	E	F	G	H				
EPS <sup>3</sup>	2.0 (16.0)	U-factor HC	1	0.056 12.20	0.055 17.00	0.055 21.80	0.054 26.60	0.054 31.40	0.047 13.90	0.039 15.87	0.041 12.10
	2.25 (18.9)	U-factor HC	2	0.048 12.22	0.048 17.02	0.048 21.82	0.047 26.62	0.047 31.42	0.043 13.92	0.036 15.89	0.038 12.11
	2.5 (20.0)	U-factor HC	3	0.046 12.24	0.045 17.04	0.045 21.84	0.045 26.64	0.044 31.44	0.040 13.94	0.034 15.91	0.036 12.13
	2.625 (21.0)	U-factor HC	4	0.044 12.25	0.043 17.05	0.043 21.85	0.043 26.65	0.042 31.45	0.038 13.95	0.033 15.92	0.035 12.14
	2.75 (22.0)	U-factor HC	5	0.042 12.26	0.042 17.06	0.041 21.86	0.041 26.66	0.041 31.46	0.037 13.96	0.032 15.92	0.0323 12.15
	3.0 (24.0)	U-factor HC	6	0.039 12.27	0.038 17.07	0.038 21.87	0.038 26.67	0.038 31.47	0.0334 13.98	0.030 15.94	0.031 12.17
	3.5 (28.0)	U-factor HC	7	0.033 12.31	0.033 17.11	0.033 21.91	0.033 26.71	0.033 31.51	0.030 14.01	0.027 15.98	0.028 12.21
	4.0 (32.0)	U-factor HC	8	0.029 12.35	0.029 17.15	0.029 21.95	0.029 26.75	0.029 31.55	0.027 14.05	0.024 16.02	0.025 12.24
XPS	2.0 (20.0)	U-factor HC	9	0.045 12.29	0.045 17.09	0.045 21.89	0.044 26.69	0.044 31.49	NA NA	NA NA	NA NA
	2.5 (25.0)	U-factor HC	10	0.037 12.35	0.037 17.15	0.036 21.95	0.036 26.75	0.036 31.55	NA NA	NA NA	NA NA
	2.625 (26.3)	U-factor HC	11	0.035 12.36	0.035 17.16	0.035 21.96	0.035 26.76	0.034 31.56	NA NA	NA NA	NA NA
	2.75 (27.5)	U-factor HC	12	0.034 12.38	0.034 17.18	0.033 21.98	0.033 26.78	0.033 31.58	NA NA	NA NA	NA NA
	3.0 (30.0)	U-factor HC	13	0.031 12.41	0.031 17.21	0.031 22.01	0.031 26.81	0.030 31.61	NA NA	NA NA	NA NA
	3.5 (35.0)	U-factor HC	14	0.027 12.46	0.027 17.26	0.027 22.06	0.027 26.86	0.026 31.66	NA NA	NA NA	NA NA
	4.0 (40)	U-factor HC	15	0.024 12.52	0.024 17.32	0.024 22.12	0.023 26.92	0.023 31.72	NA NA	NA NA	NA NA
Polyurethane	1.5 (9.09)	U-factor HC	16	0.050 12.23	0.049 17.03	0.049 21.83	0.048 26.63	0.048 31.43	NA NA	NA NA	NA NA
	2.0 (10.9)	U-factor HC	17	0.042 12.41	0.042 17.21	0.041 22.01	0.041 26.81	0.041 31.61	NA NA	NA NA	NA NA
	4.5 (20.95)	U-factor HC	18	0.023 12.58	0.023 17.38	0.023 22.18	0.022 26.98	0.022 31.78	NA NA	NA NA	NA NA
Cement/EPS Compound	2.0 (12.0)	U-factor HC	19	NA NA	NA NA	NA NA	NA NA	NA NA	0.059 16.49	0.048 18.46	0.052 14.69
	3.0 (18.0)	U-factor HC	20	NA NA	NA NA	NA NA	NA NA	NA NA	0.043 17.50	0.037 19.47	0.040 15.69
	4.0 (24.0)	U-factor HC	21	NA NA	NA NA	NA NA	NA NA	NA NA	0.034 18.51	0.031 20.47	0.032 16.70

**Notes:**

<sup>1</sup> Flat Insulated Concrete Forms utilizes rigid insulation as the form and do not use cement compound as the form.

<sup>2</sup> Waffle and screen type Insulated Concrete Forms typically utilize either a cement/EPS compound or EPS insulation as the form. ICF's using the cement/EPS compound do not utilize rigid insulation added to the interior and exterior surfaces.

<sup>3</sup> 1.5 lb density EPS insulation at R-4.0 p per inch except for the 2.25" insulation thickness which uses 2.0 lb density EPS at R-4.2 per inch.

This table provides thermal performance information for insulating concrete forms.

Insulating Concrete Forms (ICFs) are concrete forming systems that use stay-in-place panels made from a variety of insulating materials for constructing cast-in-place solid concrete walls. There are three basic types of ICFs: flat wall, waffle-grid and screen-grid. A flat wall system is a wall with uniform thickness just like a conventional poured wall made with plywood or metal forms. Waffle-grid wall systems have a solid concrete wall of varying thickness and look like a breakfast waffle. Screen grid wall systems also known as , "post and beam", have a perforated concrete wall of varying thickness similar to the waffle type wall systems but with a solid form material between the horizontal and vertical members instead of concrete. The insulating panels for all three ICF types are most commonly made from expanded polystyrene (EPS) and extruded polystyrene (XPS) rigid insulation boards. Plastic or metal cross-ties separate the insulating

panels and provide structural integrity during the pour. The ICF system is modular and stackable with interlocking edges. The materials can be delivered as pre-assembled blocks or as planks that require the flanges and web to be assembled during construction.

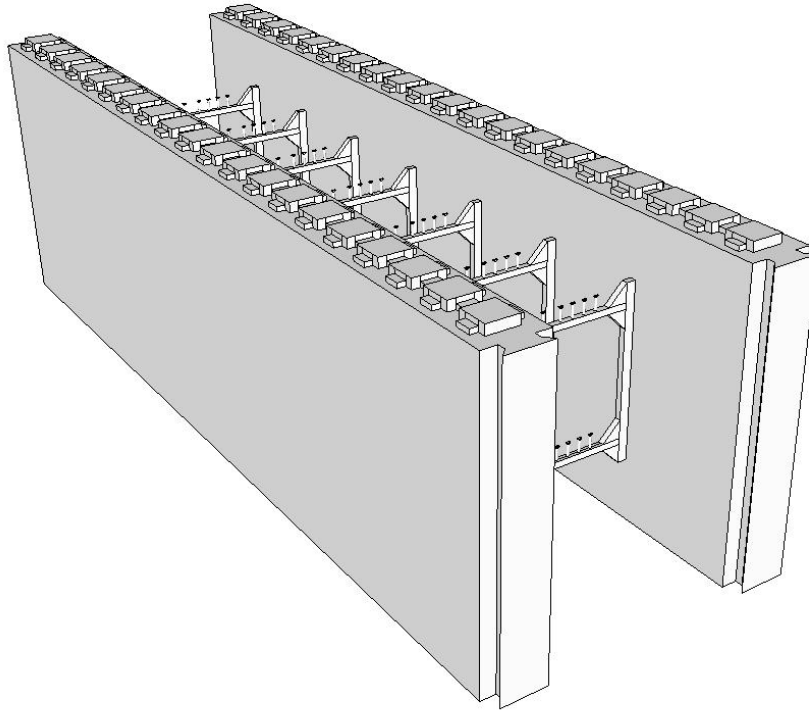


Figure 4.3.13 – Insulating Concrete Forms

**Assumptions:** Values in this table were calculated using the one dimensional calculation method documented in 2009 ASHRAE Handbook of Fundamentals. The calculations assume an exterior air film of R-0.17, a 7/8 inch layer of stucco of R-0.18, an exterior insulating form of varying resistance, a concrete core of varying thickness at R-0.11 per inch, an interior insulating form of varying resistance, 1/2 inch gypsum wallboard of R-0.45, and an interior air film of R-0.68. The R-value of the cement/EPC compound is assumed to be R-3.0 per inch, the XPS insulation assumed to be R-5.0 per inch, and the polyurethane assumed to be aged and dried in 1.5 inch, 2.0 inch, and 4.5 inch thickness.

**ASTM C578**  
*EPS THERMAL INSULATION PERFORMANCE REQUIREMENTS*

Property	Units	ASTM Test	Type I	Type VIII	Type II	Type IX	Type XIV	Type XI	Type XV
Density	pcf, minimum	C303	0.90	1.15	1.35	1.80	2.40	0.70	3.0
Thermal Resistance Values (R)	Per inch thickness at 75° F (23.9° C)	C518	3.60	3.80	4.00	4.20	4.20	3.10	4.30
Compressive Resistance 10% Deformation	psi, minimum	D1621	10	13	15	25	40	5	60
Flexural Strength	psi, minimum	C203	25	30	35	50	60	10	75
Water Vapor Permeability	perm-in; maximum	E96	5.0	3.5	3.5	2.5	2.5	5.0	2.5
Water Absorption By Total	% by Vol Max	C272	4.0	3.0	3.0	2.0	2.0	4.0	2.0

EPS Insulation may be manufactured to meet or exceed the requirements of ASTM C578, *Standard Specification for Rigid Cellular, Polystyrene Thermal Insulation*, and applicable building codes.

For more information about ASTM C578-15b, visit <http://www.astm.org/Standards/C578.htm>.



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**2016 Compliance Manual (Existing Language)**  
**Building Envelope Requirements—Envelope Features**  
**E. Insulating Concrete Forms (ICF)**

RA3.5.8

Insulating concrete forms (ICFs) is a system of formwork for concrete that stays in place as permanent building insulation is used for cast-in-place, reinforced above- and below-grade concrete walls, floors, and roofs. ICFs are interlocking modular units that can be dry-stacked without mortar) and filled with concrete as a single concrete masonry unit (CMU). ICFs lock together externally and have internal metal or plastic ties to hold the outer layer(s) of insulation to create a concrete form for the structure walls, roof/ceilings, or floors of a building. ICFs are manufactured from several materials, including expanded and extruded polystyrene foam, polyurethane foam, cement-bonded wood fiber, and cement-bonded polystyrene beads.

Three factors contribute to the energy efficiency of buildings using an ICF wall:

1. Continuous rigid insulation on both sides of a high-mass core,
2. Elimination of thermal bridging from wood framing components, and
3. A high degree of air-tightness inherent to this method of construction.

Climate Zones with large daily temperature fluctuations have the greatest potential to benefit from the time lag and temperature dampening effects of these high-mass envelope systems. However, this combination of mass and insulation is beneficial in almost all climates, with the possible exception of mild coastal climate zones.

There are three basic types of ICFs: flat wall, waffle-grid and screen-grid. A flat wall ICF results in a wall with a consistent and continuous thickness of concrete. A waffle-grid ICF creates a concrete waffle pattern, an uninterrupted grid, with some concrete sections thicker than others. A screen-grid ICF consists of a discrete post-and-beam structure with the concrete completely encapsulated by the foam insulation, except at the intersection of posts and beams. The insulating panels for all three ICF types are most commonly made from expanded polystyrene (EPS) and extruded polystyrene (XPS) rigid insulation boards. Insulating panels are also made from polyurethane, composites of cement and EPS, and composites of cement and shredded wood fiber, although these tend to be proprietary materials developed by the ICF manufacturer.

Plastic or metal cross-ties, consisting of two flanges and a web, separate the insulating panels and provide structural integrity during the pouring of concrete, resulting in a uniform wall thickness. A variety of wall thicknesses can be obtained by changing the length of the web. The area of attachment of the cross-ties to the insulating form provides a secure connection surface located at standard spacings for mechanical attachment of finished materials to the interior and exterior of the wall. ICFs can be used to construct load-bearing and non-load-bearing walls and above- and below-grade walls, and can be designed to structurally perform in any seismic zone.

The ICF system is modular and stackable with interlocking edges. The materials can be delivered as preassembled blocks or as planks that require the flanges and web to be assembled during construction. The forms vary in height from 12" - 24" and are either 4' or 8' long. Vertical panels come in similar modules but are stacked vertically. ICF panels are typically available with core thickness ranging from 4" to 12".

The thermal aspects of ICFs are represented in JA4, Table 4.3.13

**2016 Residential Compliance Manual (Expanded / Edited Language)**

**Building Envelope Requirements—Envelope Features**

**E. Insulating Concrete Forms (ICF)**

RA3.5.8

Insulating Concrete Forms (ICFs) is a system of framework for concrete that stays in place as permanent building insulation. It is used for cast-in-place, reinforced above- and below- grade concrete walls, floors, and roofs. ICF's are interlocking modular units which can be dry-stacked (without mortar) and filled with concrete ~~as a single concrete masonry unit (CMU)~~. ICF's lock together externally and have internal ~~metal or plastic~~ ties to hold the outer layer(s) of insulation. Reinforcing steel bars (rebar) placed inside the forms before concrete is poured give the concrete flexural strength. The forms are filled with concrete in 1' to 12' high lifts to manage the concrete pressure and reduce the risk of blowouts.

Insulating concrete forms are manufactured from several materials, including expanded and extruded polystyrene foam, polyurethane foam, cement-bonded wood fiber, and cement-bonded polystyrene beads. ICF construction sandwiches a heavy, high-strength material (reinforced concrete) between two layers of light-weight, high-insulated foam. This combination creates a wall with an unusually good combination of desirable properties: air tightness, strength, sound attenuation, insulation, and mass.

Three factors contribute to the energy efficiency of buildings using an ICF wall, including:

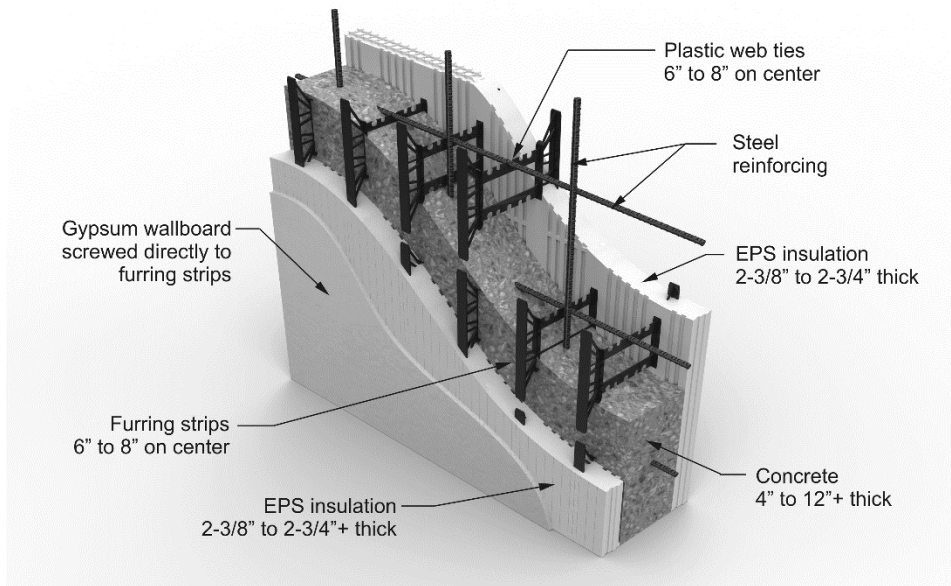
1. Continuous rigid insulation on both sides of a high-mass core,
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~~Plastic or metal~~ cross-ties, consisting of two flanges and a web, separate the insulating panels and provide structural integrity during the pouring of concrete, resulting in a uniform wall thickness (see Figure 1). A variety of wall thicknesses can be obtained by changing the length of the web. The area of attachment of the cross-ties to the insulating form provides a secure connection surface located at standard spacings for mechanical attachment of finished materials to the interior and exterior of the wall. ICF can be used to construct load-bearing and non-load-bearing walls and above- and below-grade walls, and can be designed to structurally perform in any seismic zone.

**Figure 1: ICF Wall Construction**



Source: National Ready Mixed Concrete Association

The ICF system is modular and stackable with interlocking edges (see Figure 2). The materials can be delivered as preassembled blocks or as planks that require the flanges and web to be assembled during construction. The forms vary in height from 12" – 24" and are either 4' or 8' long. Vertical panels come in similar modules but are stacked vertically. ICF panels are typically available with core thickness ranging from 4" to 12".

The thermal aspects of ICFs are represented in the JA4, Table 4.3.13.



**Figure 2: ICF Construction Process**



Source: National Ready Mixed Concrete Association

## **2016 Nonresidential Compliance Manual (Proposed Language)**

(Propose inserting after section 3.5.1 in the 2016 NonRes Compliance Manual)

Insulating Concrete Forms (ICF) are useful for the construction of nonresidential commercial and high-rise buildings. ICFs benefits for multifamily housing include thermal performance, noise elimination between party walls, strength and fire resistance. ICFs is a system of framework for concrete that stays in place as permanent building insulation. It is used for cast-in-place, reinforced above- and below- grade concrete walls, floors, and roofs. ICF's are interlocking modular units which can be dry-stacked (without mortar) and filled with ~~concrete as a single concrete masonry unit (CMU)~~. ICF's lock together externally and have internal ~~metal or plastic~~ ties to hold the outer layer(s) of insulation. Reinforcing steel bars (rebar) placed inside the forms before concrete is poured give the concrete flexural strength. The forms are filled with concrete in 1' to 12' high lifts to manage the concrete pressure and reduce the risk of blowouts.

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The thermal aspects of ICFs are represented in the JA4, Table 4.3.13.

**Figure 3: ICF Construction Process**



Source: National Ready Mixed Concrete Association

