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## Comment to Change 110.7

Additional submitted attachment is included below.

Howard Ahern Airex Manufacturing 67140 Garbino Rd Cathedral City, Ca 92234 For 2022 Energy Code Comment to Change 110.7

SECTION 110.7 - MANDATORY REQUIREMENTS TO LIMIT AIR LEAKAGE

All joints, penetrations and other openings in the building envelope that are potential sources of air leakage shall be caulked, gasketed, weather stripped, or otherwise sealed to limit infiltration and exfiltration. <u>Pipe Penetration sealing shall allow for expansion and contraction of materials and mechanical vibration</u>.

This addition is needed as piping carries hot or cold fluids or vibrate such as refrigeration piping that impact the sealing method and material used. Example would be refrigeration piping that vibrates due to equipment or oscillation of fluids. A popular sealing method used in California is expanding foam.

The Department of Energy warns the expanding foam can be turned into powder due to the friction of vibration. This foam method is not sustainable leaving large holes for costly air leakage. Fluids ban heat and cool causing expansion and contraction which can cause caulking to crack, and dislodge.

The proposed language the IECC 2018 & 2021 has adopted for all penetrations of the air barrier.