

**Comments from NCFI Polyurethanes on Joint Appendix JA 7—2008  
(Follow up on Title 24 hearing on Dec. 17, 2007)**

To: Mr. Chris Gekas

Re: Joint Appendix JA7-2008  
Comments

<b>DOCKET</b> 07-BSTD-1	
DATE	_____
RECD.	DEC 20 2007

Dear Mr. Gekas:

As a follow up to the hearing on December 17, 2007, we offer the following comments on Joint Appendix JA7 – Installation Procedures for Medium-Density, Closed-Cell and Low Density, Open-Cell Spray Polyurethane Foam (SPF):

1. JA7.2 Terminology:
  - A. The term "Vapor barrier" is not defined. We recommend removing its reference from JA7.
  - B. Spray Polyurethane Foam (SPF): The word "isocyanurate" should be spelled "isocyanate."
2. JA7.3 General Requirements
  - A. Correct typo in bullet item that begins "Low-Density SPF insulation is open cell...": The word "density" has a zero in it.
3. JA7.9 R-Value and U-Value Specifications
  - A. "For Medium Density foam all the total R-value shall be calculated based on ... an R-value of 5.8 per inch."

The R-value of closed-cell spray polyurethane foams is highly dependent on the blowing agent gas contained within the foam cells. The blowing agent gas varies with the spray foam formulation. Therefore, the R-value of closed-cell spray foam will vary from manufacturer to manufacturer and from system formulation to system formulation.

The R-value of 5.8 is not representative of closed-cell spray foams in general and does not allow for the differences between spray foams specifically.

Classifying all closed-cell spray foams with an R-value of 5.8 unfairly and erroneously misrepresents the performance of the product in the field and unfairly and erroneously positions the spray polyurethane foam insulation industry at a competitive disadvantage.

In December 2007, NCFI submitted documentation to the California Bureau of Home Furnishings and Thermal Insulation. In that submittal, we provided aged R-values of various closed-cell, medium density spray polyurethane foams as indicated in the following table:

SPF System Number	R-value per inch (°F•hr•ft <sup>2</sup> /Btu)
10-001	6.9
10-011	6.9
11-012	6.4
11-016	6.4
11-011	6.4
11-015	6.4

As there is variation in R-value between manufacturers and between systems, we recommend that the final R-value of the assembly be based on the manufacturer's labeled R-value as required in Sections JA7.3 and JA7.10.

If you have any questions on the above, we will be glad to discuss them with you.

Regards,

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