

Sent via Electronic Mail

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Re: Maryland's Proposed Rule for Adopting the 2018 International Energy Conservation Code (IECC)

The Polyisocyanurate Insulation Manufacturers Association (PIMA) thanks you for the opportunity to comment on Maryland's review and proposed adoption of an updated building energy code published in the Register on January 4. Keeping the State's building energy code updated to the current version of the IECC is an important and cost-effective policy for addressing the negative environmental impacts caused by buildings – a sector that is responsible for 40% of total U.S. energy use. This practice will help the State achieve a range of benefits, including:

- Reduced air pollution;
- Consumer and business cost savings;
- Increased flexibility and reliability of our energy system and grid;
- Reduced peak energy demand; and
- Improved energy productivity and a stronger economy.

Staying current with the model energy code ensures that Maryland will benefit from the regular improvements that happen in construction practices and component technologies. This is especially true in the area of commercial buildings where the relative pace of innovation in the areas of lighting, mechanical equipment, controls, and fenestration has been quick, and will result in an 8% improvement in commercial building efficiency for this cycle alone!

Confusing Language Regarding Air Leakage Testing

The one concern we have with the proposed rule relates to new language proposed by the Department related to air leakage testing that may cause confusion and difficulties with enforcement. We

believe this new language could easily be interpreted as requiring testing to meet a less stringent standard of 5 ACH50 instead of 3 ACH50 (which is required under the 2018 IECC base code). My understanding is that the intent of all stakeholders involved in this process is to keep 3 ACH50 as the base requirement, but to provide the builder with additional flexibility to “trade-off” air tightness up to 5 ACH50 if improvements are made elsewhere in the building to make up for this increased air leakage.¹ However, the roundabout way in which this language is proposed in the January 4th Register suggests that the base air tightness requirements for Maryland would be 5 ACH50 (instead of 3 ACH50); particularly as it relates to the interaction between the new language in R402.4.1.2 and R406.2, item 2. Also, I believe that placing 5 ACH in the Proposed Design column of Table 405.5.2(1) (for the performance path) does not clearly communicate to the code user that this is a mandatory requirement for purposes of other parts of the code.

Although I do not believe this tradeoff is necessary, if the Department determines this change is in the best interest of Maryland residents, then I would suggest minor, clarifying language similar to what has been proposed by the Responsible Energy Code Alliance (RECA). Since the modification proposed by RECA is consistent with the intent of maintaining a baseline of 3 ACH50 with allowable trade-offs up to 5 ACH50, it should qualify as a non-substantive change that would not slow up the rule-making process.

About PIMA

PIMA is the trade association for North American manufacturers of rigid polyiso foam insulation – a product that is used in most low-slope commercial roofs as well as in commercial and residential walls. Polyiso insulation products and the raw materials used to manufacture polyiso are produced in over 50 manufacturing facilities across North America. PIMA has three members with facilities located in Maryland, including the Maryland Paper Company in Williamsport, which makes facer materials for polyiso insulation boards. The insulation industry overall employs over 11,000 workers in the State.

Thank you for the opportunity to submit these comments. Please contact me should additional information be necessary (jkoscher@pima.org; (703) 224-2289).

Sincerely,



Justin Koscher
President

¹ However, trade-offs involving heating, air conditioning, and water heating equipment would not be allowed because federal law pre-empts state regulation of these items.