# International Code Council



# ICC 1100-20XX

## Ballot Comments Agenda based on input received on Ballot Draft #1

## For October, 2018 Public Teleconference Meeting

**Ballot Submitter**

B. Tollisen, affirmative

**List of Comments**

none

**Ballot Submitter**

B. Caldwell, affirmative with comment (See page 7)

**List of Comments**

Title revision

**Ballot Submitter**

R. Morrison, affirmative with comment (See page 8)

**List of Comments**

Editorial

**Ballot Submitter**

R. Childers, affirmative

**List of Comments**

None

**Ballot Submitter**

E. Banks, negative (see page 4)

**Ballot Submitter**

J. Phelan, affirmative

**List of Comments**

none

**Ballot Submitter**

J. Thomas, affirmative

**List of Comments**

None

## IS-FPI ICC 1100

**Commenter:** Eric W. Banks

**Ballot:** Negative

**Comments:**

Eric W. Banks votes Negative to ICC 1100 Standard for Spray-applied Polyurethane Foam Plastic Insulation, Ballot Draft #1 – April 2018, for the following reasons: 1) The draft standard requires technical and editorial revision and correction such that it is not yet suitable for approval and publication and 2) Necessary and suggested revision/correction include:

a) **Section 101.1** – The sentence is awkward and slightly confusing (probably an editorial fix)
b) **Section 102.1**, second paragraph – this paragraph should be clear with regard to qualifying insulation thickness in excess of the 4-inch thickness limitation of ASTM E84
c) **Section 202 – Defined Terms**
   i) All Construction Planes – editorial – "or crawl space" should follow the second "attic"
   ii) Alternative Ignition Barrier Assembly – editorial – delete "302.2.4"
   iii) Alternative Thermal Barrier Assembly – for consistency, this term should reference Section 302.4 of the draft standard
   iv) Covering – should not state "…boards, sheet goods, or liquid-applied coatings. …" Should this definition not also differentiate from facings or facers?
   v) Free Rise – Technically, insulated metal panels (IMPs) meet this definition.
   vi) Ignition Barrier – Why no IBC/IRC reference?
   vii) Roofing Applications – the term "roof covering" is more appropriate that "roof assembly" in the context of this definition.
   viii) Thermal barrier – Why no IBC/IRC reference or reference to NFPA 275?
d) **Table 1 –**
   i) "Sample Preparation" should read "Specimen Preparation"
   ii) Thermal Resistance
      (1) Sample/Specimen preparation should include language regarding the ageing as-received (i.e. with skins and substrates attached)
      (2) What about number of lifts or knit-lines?
e) **Table 2** – Same comments as to Table 1
f) **Section 301.2** –
   i) The issue of density is a persistent challenge with spray PU foam (SPF). Is "intended for use"the best language? Yes, this is code-language, however, is it accurate and representative? Perhaps "recognized density" or "marketed density" are more useful terms.
   ii) Second paragraph – "Supplemental thermal resistance" sentence should reference ASTM C1058 (and C1058 added to the Referenced Standards section)
   iii) Third paragraph –
      (1) See 2)f)i) comment regarding density
      (2) Other editorials
      (a) …based on… should read …determined using

(b) …extrapolated based on tested R-values… should read …extrapolated using the Rvalue…

g) **Section 301.3** – "Air impermeable insulation" sentence is redundant (not adding value) given the term is defined
   i) E283 modification #1 the last sentence should require the air leakage of the wood fiberboard *must* be verified as > 1.0 L/s*m^2 through testing of a blank specimen
   ii) E283 modification #4 – should read "Air leakage shall be determined in both infiltration and exfiltration configurations."

h) **Section 301.4** – IBC and IRC define the VR classes, so recommend citations

i) **Section 302.1** –
   i) Density item again; perhaps better language is "…maximum thickness and representative of the in-place density…"
   ii) Change "low-density and medium-density *spray-applied foam plastic* insulation" to *"insulation applications*" for consistency

j) **Sections 302.2.1 & 302.2.2** – Density issue

k) **Section 302.2.3** –
   i) "Testing" should read "Qualification"
   ii) This section of the standard is missing the concept and option of "other testing […] related to actual end-use configuration"

l) **Section 302.3** –
   i) Density item again
   ii) Does not reference NFPA 275

m) **Section 302.4** –
   i) Second paragraph – The *spray-applied polyurethane foam* is not qualified, it is the assembly that is getting qualified
   ii) Density item again
   iii) "…shall comply with the average measured distance between the corner walls and the burner or crib as shown in Figure 1."

n) **Section 302.4.1**
   i) "…NFPA 286 it shall comply with the following Conditions 1 through 5." Should read "…NFPA 286, the conditions of acceptance area as follows:
   ii) Also, should refer back to IBC/IRC sections on interior finishes

o) **Section 302.4.3** – This section has essentially the same name as Section 302.4, thus a little confusing

p) **Section 302.4.3.1** –
   i) This section and the limitation is out of place based on the context and placement withinAC377. AC377 effectively makes this a stand-alone section not connected to either the Special Approval or Alternative Thermal Barrier Assemblies.

q) **Section 302.5.1** – Better to indicate "Option A [or 1]" vs "Test Method A"

r) **Section 302.5.2** – This "Method B" is, for all intents and purpose, a 15 min Special Approval / Alternate Thermal Barrier Assembly test. For the sake of brevity (and good common sense) why not either (1) reference back to Section 302.4?

s) **Section 302.6.1.2.**1 – Same comment as to 302.5.2

t) **Section 302**.7 – "Building types" should read "construction types"
u) **Section 302.9.3.2** – somewhat editorial – would read better as "Smoke developed index is not limited for roofing applications in accordance with Section 2603.3…"
v) **Section 303.1.2** – better to indicate "…insulation in *insulation applications* in walls, floors, and the underside of roof decks shall be separated from…"

## IS-FPI ICC 1100

**Commenter:** Ben Caldwell

**Ballot:** Affirmative with Comment

**Comments:**

**Revise title and standard as follows:**

Standard for Spray-applied ~~Polyurethane~~ Foam Plastic Insulation

**Reason:** We need to continue to consider removing “polyurethane from Title & Standard, allowing for current and future use of a variety of plastic materials.

## IS-FPI ICC 1100

**Commenter:** Roger Morrison

**Ballot:** Affirmative with comment

**Comments:**

**SECTION 202**
**DEFINED TERMS**

**ALTERNATIVE IGNITION BARRIER ASSEMBLY.**

An assembly consisting of either the exposed *spray-applied foam plastic* or the *spray-applied foam plastic* with a fire-protective *covering,* that has been tested in accordance with and complies with the conditions of acceptance of Section 302.5 or 302.6 ~~302.2.4~~ of this standard.

**THERMAL BARRIER.** A material ~~applied over~~ which separates the *spray-applied foam plastic* insulation for the interior of the building designed to slow the temperature rise of the foam during a fire situation and delay its involvement in the **fire.**

**Reason:** Consistent with building code language.

**302.4.3 Alternative Thermal Barrier Assembly**

Revise last paragraph:

Where the spray-applied foam plastic assembly is tested in accordance with NFPA 286 or UL1715 the assembly is suitable for use in all ceiling height.

**303.1.2.1 Roofing Application Thermal Barrier Requirements** Installation of *spray-applied foam plastic* insulation in *roofing applications* shall be separated from the interior of the building as set forth in Section 2603.4.1.5 of the International Building Code or Section R316.~~4~~ 5.2 of the International Residential Code, as applicable.

**Reason:** roofing T. B. section