Thursday, 20 June 2024

Via Email: ***cbsc@dgs.ca.gov***

California Building Standards Commission
Michael Nearman, Deputy Executive Director
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

RE: 2024 Triennial Code Adoption Cycle – Comment on Proposed Amendment to the California Green Building Code

To Whom It May Concern:

The ROCKWOOL Group (ROCKWOOL) is the world's leading manufacturer of stone wool insulation. We offer a full range of high-performing and sustainable insulation products for the construction industry based on innovative stone wool technology, which help address many of society's biggest climate change challenges and create new opportunities to enrich modern living by building safer, healthier, and more climate resilient communities. ROCKWOOL appreciates the opportunity to provide feedback to the California Building Standards Commission (CBSC) on potential amendments to the Green Building Code (CALGreen) during the 2024 Triennial Code Adoption Cycle. We request that CBSC adopt two non-substantive changes to resolve an internal discrepancy and to clarify an ambiguity in the current code.

1. *The 2024 CALGreen Amendments Should Correct an Internal Discrepancy Between Requirements of Part 11, Section 5.409.3, and Attestation Language in Worksheet WS-5*

ROCKWOOL light-density and heavy-density mineral wool insulation products fall within the scope of the building products that are subject to prescribed maximum global warming potential (GWP) limits in Section 5.409.3 of the Green Building Code adopted during the 2022 Intervening Code Cycle. Our review of the recently adopted provisions regarding these GWP limits indicates that they are internally inconsistent. Section 5.409.3, and the related Table 5.409.3, prescribe emissions limits, a "maximum acceptable GWP value" that products must not exceed (See Section 5.409.3.1.). Worksheet WS-5, the "Responsible Designer's Declaration Statement," requires the responsible designer to attest that products have met "10 percent reduction in global warming potential as specified in Table 5.409.3," and to ensure that material specifications substantially comply with the GWP limits on approved plans to secure "the minimum 10 percent reduction in global warming potential." However, neither Section 5.409.3 nor Table 5.409.3 include a requirement for a 10 percent reduction in GWP; they only require products to meet a maximum acceptable GWP value.

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This internal discrepancy between the requirements of Section 5.409.3 and the required compliance attestation language in Worksheet WS-5 is likely to cause significant confusion when the 2022 amendments become effective on July 1, 2024. CBSC can avoid this undesirable outcome by adopting minor edits to Worksheet WS-5 to resolve the inconsistency, such as the following:

WORKSHEET (WS-5)
Section 5.409.3 PRODUCT GWP COMPLIANCE - PRESCRIPTIVE PATH

Responsible Designer's Declaration Statement:
I attest that prescriptive compliance has been performed according to the requirements of Section 5.409.3 and products have ~~met~~ *not exceeded* the ~~minimum 10 percent reduction in~~ *maximum* global warming potential *value* as specified in Table 5.409.3. Furthermore, I will ensure during construction that the material specifications will be reviewed for substantial conformance with the global warming potential limits indicated on the approved plans so at the close of construction the ~~minimum 10 percent reduction in~~ *maximum* global warming potential *value* is thereby ~~secured~~ *not exceeded*.

Signature:

Company: Date:

Address: License:

City/State/Zip: Phone:

2. *The 2024 CALGreen Amendments Should Clarify that Part 11, Section 5.504.4.7, Does not Apply to Exterior Building Envelope Insulation or Exterior Pipe Insulation*

ROCKWOOL produces rigid, high-density products, such as Cavityrock® and Comfortboard® 80/110, that are designed specifically for use as exterior continuous (envelope) insulation in commercial and residential applications. The use of ROCKWOOL's exterior insulation products substantially increase the thermal efficiency of interior insulated building envelope assemblies, are used to comply with insulation requirements in the 2022 California Energy Code, Title 24, Part 6, and improve the fire resistance of buildings, among other benefits.

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CALGreen, Part 11, Section 5.504.4.7, requires thermal insulation "finish materials" to "comply with the requirements of the California Department of Public Health (CDPH), 'Standard Method for Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers,' Version 1.2, January 2017 (Emission testing method for California Specification 01350)." This emission testing method only "applies to any product category generally used within the envelope of an enclosed indoor environment," not to external envelope or finish materials such as exterior continuous insulation.[1] Nevertheless, because Section 5.504.4.7 does not exclude external finish materials, some local jurisdictions have misinterpreted it to require external envelope and pipe insulation products to comply with the CDPH indoor air emissions testing method.

To eliminate any ambiguity and avoid future confusion over the scope of Section 5.504.4.7, ROCKWOOL requests that CBSC adopt the following minor clarifying edit:

> 5.504.4.7 Thermal Insulation.
> *Thermal insulation generally used within the building envelope of an enclosed indoor environment shall comply* ~~*Comply*~~ with the requirements of the California Department of Public Health (CDPH), "Standard Method for Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers," Version 1.2, January 2017 (Emission testing method for California Specification 01350).
> * * *

ROCKWOOL requests that CBSC include the above proposed clarifying edits in the CALGreen amendments to be adopted during the 2024 Triennial Code Adoption Cycle. Thank you for your consideration of our comments.

Sincerely,

Mark Bromiley, VP Business Development
ROCKWOOL

[1] CDPH, "Standard Method for Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers," Version 1.2, January 2017 (Emission testing method for California Specification 01350), Section 1.1.1 (Scope).

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