

SUMMARY OF TOPICS

The following topics were discussed at the meeting of the Standards Technical Panel for Sustainability of Thermal Insulation, STP 115:

- 1. General Comments on the Proposed Standard***
- 2. Comments on Section 5, Glossary***
- 3. Comments on Section 7, Evaluation and Assessment Criteria***
- 4. Comments on Section 17, Installation Guidance for Professionally Applied SPF Products***
- 5. Comments on Section 21, Toxic Materials Inventory and Characterization***
- 6. Comments on Section 23, Indoor Environmental Quality (IEQ)***
- 7. Comments on Section 24, Standard Specifications for Insulation***

A meeting of the Standards Technical Panel of UL for Sustainability of Thermal Insulation, STP 115 was held on May 21, 2013 at UL's Northbrook, IL office. The purpose of the meeting was to discuss the comments received on the proposed first edition of the Standard for Sustainability for Thermal Insulation, UL 115.

The purpose of the STP meeting report is to briefly summarize discussions held during the meeting, and to document any resulting outcomes, including planned future action.

CALL TO ORDER, ANNOUNCEMENTS, INTRODUCTION OF MEMBERS, GUESTS, AND OBSERVERS

The STP Chair, Dan Ryan, called the meeting to order at 8:30am CST on May 21, 2013. The meeting attendees introduced themselves; a list of the attendees at the meeting is at the end of this report.

The Chair also explained UL's standards development process. The ultimate goal of the standards development process is to publish a consensus (ANSI) standard. In order to achieve consensus, a proposed standard must be balloted. Consensus is achieved when more than 50% of the STP votes on the proposal and of those voting, 2/3rds support the proposal. Even if consensus is achieved, comments accompanying negative votes, responses to those comments, and any changes to the proposal resulting from the comments must be considered by the STP through recirculation. During recirculation, STP members have the opportunity to change their votes based on their individual consideration of the recirculated materials. If consensus is maintained, the standard is then published as an American National Standard. More detailed information regarding UL's standards development process is available at <http://ulstandardsinfo.net/ul.com/generalinformation/StandardsDevMaintProgrambrochure.pdf>.

**FOR UL INTERNAL REFERENCE OR CSDS USE ONLY –
NOT FOR OUTSIDE DISTRIBUTION**



Documents

Document Sharing Hub

UL anticipates that the next time this proposed standard is issued for review and comment it will also be solicited for ANSI ballot by the STP.

ANNOUNCEMENTS AND REPORTS FROM THE STP PROJECT MANAGER

The current balance of the STP was discussed at the meeting and is shown in the following table:

Interest Category	Number of Members	Interest Category	Number of Members
Producers	10	Government	2
Testing & Standards Organizations	4	Consumer	0
Supply Chain	1	General Interest	4
AHJs	0	Commercial/Industrial User	0

UL's goal is to have no interest category comprise more than one-third of the STP membership. As such, UL is currently looking for participants in all interest categories except testing and standards organizations. If you have potential candidates, please contact the STP Project Manager. A definition of the interest categories is available on the Standards STP Internet site, located at <http://ulstandardsinfolnet.ul.com/stp/index.html>.

FUTURE MEETING SCHEDULE

Future meetings will be held on an as-needed basis.

For your convenience in review, proposed additions to existing requirements are shown underlined and proposed deletions are shown ~~lined-out~~.

1. General Comments on the Proposed Standard

Agenda Comment 1

CSDS Comment Reference Number: 3

Comment Author: Todd Bergstrom, AFM Corp

Comment

It is clear that much work has gone into edits in individual sections, but it would be helpful if the document as a whole is reviewed by UL staff or the Committee to ensure improved flow to the document and to ensure similar does not exist. Example: Points for waste in Table 10.1 and 19.1 should be grouped together or one section eliminated.

In addition, the point allocation/balance should be reviewed by the committee as a whole. For example, can a "good" product from a company with "poor" stewardship meet the standard or can a "poor" product from a company with "good" stewardship meet the standard.

Suggested Revision By Commenter

N/A

Comment Response

This comment to be addressed by the Task Group on Point Balancing & Tiering.

**FOR UL INTERNAL REFERENCE OR CSDS USE ONLY –
NOT FOR OUTSIDE DISTRIBUTION**



Documents
Document Sharing Hub

Agenda Comment 2**CSDS Comment Reference Number: 5**

Comment Author: Kelly Wedell, Environmental Protection Agency

Comment

For this to be a sustainability standard, criteria must clearly address health and safety from a lifecycle perspective. Insulation is a use category, so performance will tie to R value and energy savings, but that is not good enough for serving as a measure for evaluating environment and health attributes. Since insulation is a "use" category an objective to compare insulation across many different product types may not be feasible, the ability to compare may need to be across similar types of insulation products.

The proposed language of this standard has failed to clarify whether it is a product, a use, a manufacturer, or a plant/facility that is subject to the standard. In one comment UL responds that, "UL sustainability standards have typically been applied on a per plant basis given the differences in location, facility age and technology and other factors. Products achieving certification will be specific to those facilities demonstrating compliance with UL 115." EPA is very much concerned that the issue of in-situ manufacturer of thermal insulation products, manufactured on-site in a home or school has not been adequately addressed. For in-situ manufactured insulation, such as spray polyurethane foam (SPF) or spray polystyrene, it is still not clear what is the "product" that is being certified. Is it the two component 55 gallon drums brought to the application site, or the installed and cured product? We also ask that question for insulation materials that undergo partial on-site chemical reactions during installation, such as adding adhesive chemistry that becomes incorporated part of the insulation product.

ULE's response further complicates the issue. Are we to understand that a home is a plant for insulation products manufactured in-situ?

In another response, ULE responds that a product use phase is addressed in the standard in so far as the product must perform as labeled. What label is considered applicable for in-situ manufactured products where there is limited ability for quality control and assurance in the application/production phase?

Comment Response

This comment to be addressed by the Task Group on Field Installation (Health & Safety).

Comment

We noted that one commenter suggests that end-of-life should be excluded as the responsibility of the manufacturer. This standard should address and make certain that the standard requires EOL responsibility for products where EOL may result in health and environmental hazards. Installed insulation does not typically retain "labels" overtime that describe the product composition; homes and building change hands from the original builder or homeowner who have had the product installed. This is an important issue for any sustainability or green standard.

Comment Response

Clause 25.1 revised as follows:

**FOR UL INTERNAL REFERENCE OR CSDS USE ONLY –
NOT FOR OUTSIDE DISTRIBUTION**



Documents
Document Sharing Hub

25.1 A product shall receive 3 points when the manufacturer shall document documents company support for ongoing landfill diversion projects or programs which include demonstration of secondary uses of recovered insulation recovered from materials. Documentation of this support shall be illustrated in one or more of the following manufacturer publications: financial reports, brochures, literature, technical data sheets, or partnerships.

Comment

When using GHS references, there needs to be care in assuring that Safety Data Sheets are adequately and honestly responsive to items 12-15 (ecotox and disposal), these items do not fall within U.S. OSHA's enforcement and compliance jurisdiction but represent important environmental attributes. A standard is an ideal place to make these a requirement.

Comment Response

Kelly Wedell, EPA to provide proposed revisions of Table AB of Appendix B.

Comment

Regarding the issue of the National Fire Protection Association (NFPA) Hazard Classification and smoke inhalation, other commenters urge that inhalation should be addressed as part of the standard if not currently. Chemical compounds change in the event of fire and can result in adverse health outcomes. ULE responds that combustion toxicity is outside the scope of the standard and outside the intended scope of the toxicological assessment. That is not an acceptable approach. Not only can fires from insulation materials result in the production of toxic compounds, such as hydrogen cyanide, carbon monoxide, isocyanates, etc., but there is also concern for firefighters where with many insulation products adding so much plastics into the home that the oxygen is consumed before the combustibles and when air is added to release toxins, the fire explodes, further endangering firefighters. These are challenging issues to address but for a standard to be promoted as signifying sustainable products, lifecycle issues need to be addressed, even if only through education requirements that better inform decision-makers to potential hazards.

Comment Response

These aspects are outside the scope of this standard.

2. Comments on Section 5, Glossary

Agenda Comment 3

CSDS Comment Reference Number: 2

Comment Author: Jason Hoerter, NCFI Polyurethanes

Comment

The definition on the EPA website is different than the one given here.

Suggested Revision By Commenter

5.23 GLOBAL WARMING - The recent and ongoing global average increase in temperature near the Earth's surface. (Reprinted from EPA <http://www.epa.gov/climatechange/glossary.html#G> An average increase in the temperature of the atmosphere near the Earth's surface and in the troposphere, which

FOR UL INTERNAL REFERENCE OR CSDS USE ONLY –

NOT FOR OUTSIDE DISTRIBUTION



Documents

Document Sharing Hub

can contribute to changes in global climate patterns. Global warming can occur from a variety of causes, both natural and human induced. In common usage, "global warming" often refers to the warming that can occur as a result of increased emissions of greenhouse gases from human activities. The sustained increase of the average temperature of the earth's atmosphere, resulting in climatic change, due to the increased emission of greenhouse gases.

Discussion

Discussion Reference number: 2.1

Discussion Author: Kelly Wedell, Environmental Protection Agency

Comment

There are several definitions found on EPA websites, depending on the context. The originally proposed definition is more complete.

The following link demonstrates the variety of definitions: http://ofmpub.epa.gov/sor_internet/registry/termreg/searchandretrieve/termsandacronyms/search.do?matchCriteria=Contains&checkedTerm=on&checkedAcronym=on&search=Search&term=global%20warming

Comment Response

Kelly Wedell, EPA to provide definition of GWP.

Agenda Comment 4

CSDS Comment Reference Number: 4a

Comment Author: Dwight Shuler, Owens Corning

Comment

Add new definition: "LOOSE FILL INSULATION – as defined in ASTM C168, Standard Terminology Relating to Thermal Insulation".

Suggested Revision By Commenter

N/A

Comment Response

The definition for Loose Fill Insulation from ASTM C168 is to be added. Valara Davis, UL Standards will address any possible copyright issues.

FOR UL INTERNAL REFERENCE OR CSDS USE ONLY –
NOT FOR OUTSIDE DISTRIBUTION



Documents
Document Sharing Hub