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Subject: Comment regarding December 7, 2012 proposed rulemaking of Subtitle 12 A Building Code Supplement of 2013, Chapter 14, Section 1403.5,

The Extruded Polystyrene Foam Association (XPSA) appreciates the opportunity to offer comments regarding proposed revisions to the 2012 International Building Code through development and adoption of the Building Code Supplement of 2013.

### Comment

Instead of striking Section 1403.5, as published in the December 7, 2012 proposed rulemaking, XPSA recommends inserting new exceptions in Section 1403.5 in the Building Code to read as follows:

**1403.5 Vertical and lateral flame propagation.** Exterior walls on buildings of Type I, II, III or IV construction that are greater than 40 feet (12 192 mm) in height above grade plane and contain a combustible water-resistive barrier shall be tested in accordance with and comply with the acceptance criteria of NFPA 285.

#### Exceptions:

1. Walls in which the water-resistive barrier is the only combustible component and the exterior wall has a wall covering of brick, concrete, stone, terra cotta, stucco or steel with minimum thicknesses in accordance with Table 1405.2.
2. Walls in which the water-resistive barrier is the only combustible component and the water-resistive barrier has a Peak Heat Release Rate of less than  $150 \text{ kW/m}^2$ , a Total Heat Release of less than  $20 \text{ MJ/m}^2$ , and an Effective Heat of Combustion of less than  $18 \text{ MJ/kg}$  as determined in accordance with ASTM E1354 and has a flame spread index of 25 or less and a smoke-developed index of 450 or less as determined in accordance with ASTM E84 or UL 723. The ASTM E1354 test shall be conducted on specimens t the thickness intended for use, in the horizontal orientation and at an incident radiant heat flux of  $50 \text{ kW/m}^2$ .
3. Windows and doors and flashing for windows and doors shall not be considered to be part of a water resistive barrier for purposes of this section.

Reasoning and justification for this recommendation:

These proposed exceptions inserted in Section 1403.5 were adopted by the ICC membership for the 2015 edition of the International Building Code at their Annual Meeting in Portland, OR in October, 2012 (ICC proposal FS147-12). This wording was supported by many interested parties, and is similar to that proposed by NIBS/BEC which the ICC membership rejected in favor of these revisions.

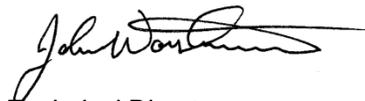
These revisions will allow, under many circumstances, the use of water-resistive barriers in exterior wall system without the need for NFPA 285 testing.

Some water-resistive barriers add significant quantities of combustible materials into exterior walls that are required to be of noncombustible construction. Full-scale fire testing demonstrated this problem. Since Section 1403.5 was placed into the 2012 edition of the IBC, test experience with some water-resistive barriers has led to the development of the exceptions in the proposed wording.

This proposed language provides the capability to use some water-resistive barriers in many exterior walls while still providing a measure of fire safety to the exterior walls.

Best regards,

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