

barrier insulations for which the standard may be used; the accuracy of the determinations made under the standard; and whether the Commission should require that energy-saving or other performance claims for radiant barrier insulations be based on the standard. 64 FR at 48039–40.

Comments

NAIMA asserted that the elusive quality of radiant barrier insulation's varying characteristics makes assigning an R-value rating nearly impossible. NAIMA stated that tests conducted at DOE and other labs demonstrate an ability to predict certain energy savings only when no variables interfere with the product's performance. Unfortunately, according to NAIMA, the DOE study shows that the product is vulnerable to numerous factors that can diminish its effectiveness. NAIMA contended that no single protocol or method currently exists that is capable of consistently rating the thermal performance of radiant barrier insulations. It maintained that, until such a test becomes available, the Commission should prohibit thermal performance claims for these products. NAIMA argued that such a restriction may provide an incentive for radiant barrier producers to develop the standard needed for supporting thermal performance claims.⁸³

RIMA opposed adoption of ASTM C 1340–96. RIMA contended that, while the standard is a useful tool and a good starting point for calculating savings from radiant barriers, it does not account for the presence of air conditioning ducts in attics, which can significantly affect heat gain and overall savings. Without being specific, RIMA suggested that the Commission consider other programs that are more comprehensive in energy-saving determinations.⁸⁴

Discussion

The Commission continues to find that R-value claims are not appropriate for radiant barrier reflective insulations because there is no generally accepted test procedure to determine the R-value of such insulations installed in an open attic or elsewhere. Sellers who make energy-saving claims for radiant barrier insulations, however, must have a reasonable basis for the claims under Section 460.19(a) of the Rule. It should be noted that ASTM C 1340–96 enables a determination of the heat flux through an attic containing a radiant barrier. The results do not provide an R-value rating,

but do yield a performance value that may aid industry members in developing support for their energy-saving claims (and related performance claims) made about radiant barrier insulations. The Commission does not propose any amendments to the Rule on this subject.

6. Additional Laboratory Procedures for Testing Loose-Fill Insulations

The Rule currently specifies only the basic R-value test procedures and test specimen preparation procedures for certain products that are necessary to account for factors that can significantly affect R-value results (e.g., aging, settling). The ANPR asked whether there is a need to specify in more detail the laboratory procedures that should be followed in preparing test specimens and conducting R-value test procedures. The Commission explained that ASTM C 687 ("Standard Practice for Determination of Thermal Resistance of Loose-Fill Building Insulation") is a detailed standard practice, rather than a test procedure, and that it specifies procedures to be followed in testing a variety of loose-fill insulations for use in non-enclosed applications. The Commission considered it unnecessary to require adherence to more detailed standard practice or standard guide specifications, such as ASTM C 687. The Commission did not receive any comments in response to the ANPR supporting a requirement for detailed laboratory operating procedures for these insulations. Accordingly, the Commission is not proposing any amendments to the Rule.

E. Other Disclosure Issues

1. Disclosures on Labels and Fact Sheets

a. "What You Should Know About R-values"

The ANPR sought comment on whether the Rule should require disclosure in fact sheets of additional or different information for consumers to consider when purchasing insulation. Several commenters suggested additional disclosures on fact sheets, including noting that R-values may decrease when insulation material is installed between structural members (e.g., wall studs, floor joists, etc.),⁸⁵ information regarding the impact of long-term aging on material,⁸⁶ and disclosures regarding moisture content.⁸⁷ Both PIMA and NAIMA opposed changes to the Rule in this regard. PIMA stated that the inclusion of

additional factors may create some confusion with consumers. NAIMA indicated that the current requirements are understandable to most consumers and that manufacturers are free to supplement required disclosures with additional fact sheets and materials.

The Commission understands that there are additional disclosures that could be added to fact sheets; however, we are not convinced that the additional burdens imposed by new disclosure requirements would be outweighed by increased consumer benefits. 64 FR at 48041. Thus, the Commission is not proposing any amendments to the Rule regarding this issue.

b. Disclosures for Batt, Blanket, and Boardstock Insulations

Background

Subsections 460.12(b)(1) and (b)(4) of the Rule require manufacturers to label all packages of "mineral fiber batts and blankets" and all board stock insulations with a chart showing the R-value, length, width, thickness, and square feet of insulation in the package, and section 460.13(c)(1) requires that they include the chart on the manufacturer fact sheets. As indicated in the ANPR, NAIMA recommended amending section 460.12(b)(1) to apply to *all* batt and blanket insulation products by deleting the reference to "mineral fiber." NAIMA asserted that batts and blankets made of other materials, such as cotton, other cellulosic materials, and plastic fiber, have been introduced into the marketplace and that the Rule should specify labeling requirements for these new batt and blanket products. 64 FR at 48041.

Comments

In its ANPR comments, NAIMA reiterated its view indicating, among other things, that there is no valid argument to exempt any particular type of batt or blanket.⁸⁸ PIMA also supported deleting the phrase "mineral fiber" to ensure that all types of batt/blanket insulation are consistently covered.⁸⁹

Discussion

The Commission agrees that all types of batt and blanket insulations should be labeled with the same basic R-value and coverage area information, and that manufacturers' fact sheets for these insulation products should include these disclosures. Section 460.12(b) refers to "mineral fiber" batts and blankets because, when the Rule was

⁸³ NAIMA (9), p. 22.

⁸⁴ RIMA (19), p. 1.

⁸⁵ Troutman/T-Foil, (1).

⁸⁶ FPSA (8), pp. 7–8.

⁸⁷ DOE (20), p. 1.

⁸⁸ NAIMA (9), p. 23.

⁸⁹ PIMA (3), p. 7.