

e-MEMORANDUM

To: All State Building Inspectors and all Municipal Building Departments

From: DPS/BBRS staff

Date: August 21, 2009

Subject: Exaggerated Building Thermal Envelope Insulation “R” Values / “Labeling and Advertising of Home Insulation 16CFR460”

This e-MEMORANDUM is issued in an effort to clarify insulation R-value labeling requirements so that Massachusetts State Building Code-required thermal envelope insulation levels, as dictated by Chapters 13, 34, 53 and 93, as applicable, and also as required for residential buildings in the recently adopted Stretch Code¹, are satisfied – exaggerated R-Value claims exist and caution needs to be exercised.

16CFR460 (“Labeling and Advertising of Home Insulation 16CFR460”) requires all Insulation Manufacturers of residential insulation to provide R-value identification on their products or in such products’ packaging. **Section 460.12 regulates how the R-values are to be labeled on different products** and also states R-values shall apply to either strictly the insulation or the “system R-value,” the latter (“system R-value”), requires that the specific system that is utilized be noted – please refer to the Attachment to this e-MEMORANDUM, which is a full copy of 16CFR460.

Knowing the actual R-values of the thermal insulation or the “system R-values” is necessary to ensure prescriptive thermal insulation compliance and/or proper REScheck inputs and compliance outputs – again, the guidelines for identifying these R-values can be found in 16CFR460 specifically, Section 460.12 entitled Labels.

Should Building Departments encounter insulation products for which insulation values are not identified, please refer Building Permit Applicants to the attached 16CFR460 so that Applicants may seek out, from the Insulation Manufacturer, the correct R-value information and provide same to the Building Department.

If Building Officials otherwise have any questions regarding this announcement, please contact Tom Riley or Don Finocchio, both BBRS staff.

¹ The so-called “Stretch Energy Code”, although promulgated by the BBRS, cannot be adopted and enforced at the local level until such Municipal Building Inspectors in that community complete training on the Stretch Code and the community adopts the Stretch Code via a public process.