

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

Author/requestor: **Tim Manz**

Email address: **tim.manz@minneapolismn.gov**

Telephone number: **612-673-3726**

1346, IMC #20a

Firm/Association affiliation, if any: **MN Chapter of ASHRAE**

Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

IMC Section 604.1 is amended to read as follows:

604.1 General. Duct insulation shall conform to the ~~thickness required by this section and Sections 604.2 through 604.13 and the *International Energy Conservation Code*~~ as amended.

Exception: ~~Except as required to prevent condensation, ducts for which heat gain or loss, without insulation, will not increase the energy requirements of the building.~~

Minimum Required Duct Insulation (see notes for explanations)	
Duct Location	Requirements
Attics, garages, and ventilated crawl spaces	R-8 and V
Exterior of building	R-8, V and W
Inside of building and in unconditioned spaces TD less than or equal to 15°F	None required
TD greater than 15°F and less than or equal to 40°F	R-6 and V
TD greater than 40°F	R-6 and V
Within conditioned spaces, in basements with insulated walls, and in plenums within conditioned spaces	None required
Intake and exhaust ducts within conditioned spaces*	R-3.3 and V
Within cement slab or within ground (also see IMC Section 603.8)	R-3.5

Notes:

*Insulation required for a distance of 3 feet (914 mm) from the exterior.

TD = Design temperature differential between the air in the duct and the ambient temperature outside of the duct.

V = Vapor retarder required in accordance with IMC Section 604.11. When a vapor retarder is required, duct insulation required by this section shall be installed without respect to other building envelope insulation.

W = Approved weatherproof barrier.

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

Minimum R-values for duct insulation have historically been found in the model energy codes instead of the model mechanical codes across the country, however, Minnesota has included them in the mechanical code for convenience for many years. With the increased realization in recent years that duct insulation is more closely related to other energy code provisions, it is appropriate to include the duct insulation tables only in the energy code. This will encourage the mechanical industry to obtain copies of the energy code, in addition to the mechanical code, so that they can have access to all of the pertinent energy code provisions that are a critical part of the heating, ventilation, air-conditioning and refrigeration (HVACR) industry. This is reasonable because it is done in other jurisdictions across the country and it is the only way that the mechanical industry and other users of the mechanical code will have the information needed to comply with the HVACR provisions contained in the energy code.

Proposed Code Change – Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

Since the section is reverting back to original language in Section 604.1 of the 2012 IMC, there are no cost implications.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

Section 604.1

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation.

No.

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

No.

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code.

No.

5. Who are the parties affected or segments of industry affected by this proposed code change?

Users of the mechanical code who have not obtained copies of the energy code in the past.

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

No.

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement.

No.