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To: DES SBCC <sbcc@des.wa.gov>

Subject: Testimony on the adoption of the 2018 WSEC-Commercial - C402.1.5.2 Building test

The code change to increase air tightness of buildings while simultaneously requiring a passed test will lead to confusion and costly construction schedule delays.

Guidance must be provided as to what to do with failed test. Must all buildings re-test (repeatedly potentially?) until the limit is reached? The proposed suggestion below allows for buildings that meet the 2015 WSEC air leakage rate to avoid re-testing while providing a report on how measures were taken to improve the air leakage. Buildings failing the 2015 WSEC air leakage rate must re-test.

Propose the following Code language change (**restore the stricken sentence** and **revise as shown**):

C402.5.1.2 Building test. The completed building shall be tested and the air leakage rate of the building envelope shall not exceed 0.25 cfm/ft² at a pressure differential of 0.3 inches water gauge (2.0 L/s x m² at 75 Pa) at the upper 95 percent confidence interval in accordance with ASTM E 779 or an equivalent method approved by the code official. A report that includes the tested surface area, floor area, air by volume, stories above grade, and leakage rates shall be submitted to the building owner and the code official. **If the tested rate exceeds that defined here by up to 0.15 cfm/ft², a visual inspection of the air barrier shall be conducted and any leaks noted shall be sealed to the extent practicable. An additional report identifying the corrective actions taken to seal air leaks shall be submitted to the building owner and the Code Official and any further requirement to meet the leakage air rate will be waived. If the tested rate exceeds 0.40 cfm/ft², corrective actions must be made and the test completed again. A test above 0.40 cfm/ft² will not be accepted.**

Thank you,
Robby Oylear