

**From:** Curleata Reykdal <curleata@gmail.com>  
**Sent:** Friday, October 4, 2019 3:33 PM  
**To:** DES SBCC <sbcc@des.wa.gov>  
**Subject:** Fwd: proposed code change to R402.4.1.2

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**From:** **CURLEATA Reykdal** <[advancedblowerdoor@gmail.com](mailto:advancedblowerdoor@gmail.com)>  
**Date:** Tue, Sep 24, 2019 at 8:13 PM  
**Subject:** proposed code change to R402.4.1.2  
**To:** <[atsbcc@des.wa.gov](mailto:atsbcc@des.wa.gov)>

Doug Orth,

I have some major concerns of the new code going into affect that will cause all construction to have incorrect test results. To get a true and accurate reading on any structure you will need to enter the correct square footage and correct volume. Today for example I ran the test on a 3027 square foot home with both the correct volume of 29279 (ACH was 4.089) then it was ran with the volume the way it would be if the code to changes the incorrect volume would be 25730 (ACH was 4.664). I know this seems minimal, but for a builder with a larger houses with tall ceiling heights and are already close to not passing this will very likely cause them to fail when they should have a passing test if done properly.

Also as an owner and a tester I will be required to sign off on tests that are not accurate and Washington State know the results will not be accurate.

I understand the thought of trying to make regulations tighter. So go ahead and lower the numbers not to exceed maybe 3 ACH or 4 ACH per hour and leave the volume alone. This will allow us to see accurate test results for all builders and let them know where they need to improve. If Washington state wants to know what is actually being saved we need to have accurate readings, then and only then will we be able to move in the right direction.

An easy visual example would be to tell everyone that they can wear a size 32 jeans, but obviously not everyone can. People that are smaller would fit into them with room to spare and people that are larger would be unable to fit and this is basically the same thing.

**R402.4.1.2 Testing.** The building or dwelling unit shall be tested and verified as having an air leakage rate of **not exceeding 5 air changes per hour**. Testing shall be conducted with a blower door at a pressure of 0.2 inches w.g. (50 Pascals). For this test only, the volume of the home shall be the conditioned floor area in ft<sup>2</sup> (m<sup>2</sup>) **multiplied by 8.5 feet** (2.6 m). Where required by the *code official*, testing shall be conducted by an *approved* third party. A written report of the results of the **test shall be signed by the party conducting the test** and provided to the *code official*. Testing shall be performed at any time after creation of all penetrations of the *building thermal envelope*. Once visual inspection has confirmed sealing (see Table R402.4.1.1), operable windows and doors manufactured by *small business* shall be permitted to be sealed off at the frame prior to the test.

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