



TO: Representative Jules Bailey

FROM: James Curry, Director of Government Affairs

DATE: April 8, 2013

RE: Response to questions on HB 2005 – state building code amendments on mechanical insulation

On Thursday, April 4, Northwest Food Processors Association testified before your committee with concerns on HB 2005. This measure makes changes to the state building code establishing mechanical insulation standards applicable to industrial buildings. Our concerns lie in the potential impact this would have on food processing equipment because of the meaning of mechanical insulation.

The state building code is properly applied to the regulation of the building envelope and space conditioning for human occupancy. In this regard, the building code appropriately regulates efficiency standards in HVAC and lighting systems. HB 2005 has the potential to allow for regulating industrial efficiency of boilers, chillers and other manufacturing equipment used in food processing that should not be within the purview of the state building code.

Mechanical insulation is thermal insulation and applies to boilers, chillers and other equipment. There are specific food safety needs that are unique to food processing equipment which should not be under the authority of the building code. There are already voluntary standards under ASTM International Standards that help drive energy efficiency in this area, but state mandates are not needed. Food processing equipment cannot be regulated for efficiency by the state due to food safety requirements, so voluntary efforts provide for the flexibility needed on a product-by-product basis.

It is our suggestion that if HB 2005 is to move forward, it should include amendatory language similar to the following that makes it clear that industrial manufacturing and processing equipment is not covered by the state building code: ***The provisions of this chapter do not apply to equipment or processes used for commercial or industrial processing or activities unrelated to the building structure.***

Mechanical insulation efficiency standards should be applied only to heating and cooling systems for comfort or human space conditioning and occupancy. Any regulation of food processing equipment for efficiency standards is beyond the scope of the state building code and would impact the ability of companies to comply with food safety requirements and temperature control on specific food products.

Please contact me or our lobbyists with any questions:
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