



AUG 11 2015

SUBJECT: Standards for Spray Polyethylene Foam (SPF) installed under  
NRCS CPS 374 and CPS 372

TO: State Conservationists  
Directors, Caribbean and Pacific Islands Areas File Code: 450-11

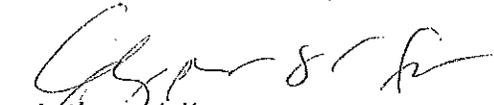
Questions have arisen about which standards apply to the retrofit of existing poultry houses to improve energy efficiency through application of spray polyethylene foam (SPF) insulation. We have determined that going forward all building envelope improvements, including SPF insulation, installed under Natural Conservation Resources Service (NRCS) Conservation Practice Standard (CPS) 374, "Farmstead Energy Improvement," must conform to the requirements of NRCS CPS 672 "Building Envelope Improvement."

CPS 672 requires that insulation materials and vapor retarders exposed to the interior of the building will meet specifications described in ANSI/ASABE S401.2, "Guidelines for Use of Thermal Insulation in Agricultural Buildings." S401.2 requires that installation assemblies meet smoke, flame, and end use tests cited in Section 4.1 and, failing that, must be separated from the interior of the building by an ignition/thermal barrier as specified in Section 4.3.

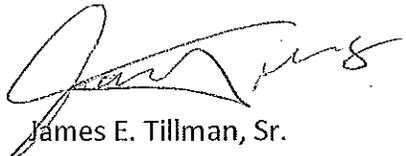
CPS 374 provides that "Where required, certify that the replacement or retrofit system and related components or devices meet or exceed currently applicable Federal, state, and local standards and guidelines. Components of major activities by farm enterprises defined in ASABE S612 shall meet the appropriate NRCS or industry standard...". Some States have interpreted these provisions to permit installation of SPF under CPS 374 in compliance with practice accepted by state code officials, and endorsed by the insurance industry and experts in poultry house technology. Specifically these entities may not require use of a thermal barrier for poultry house SPF insulation where needed. This interpretation is superseded by the requirement established here that all future installations must comply with CPS 672 and S401.2. Thermal barriers must be used going forward if needed to comply with ANSI/ASABE S401.2.

Whether or not to provide technical or financial assistance to upgrade prior SPF installations to meet CPS 672 is a separate, programmatic issue not mandated by the direction here to require compliance with CPS 672 for new retrofit installations going forward.

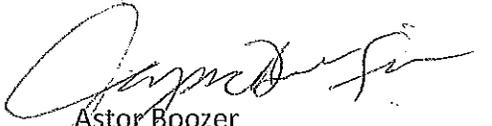
Our primary concern is to conform practice regarding fire hazard mitigation in new retrofit installations going forward. The need for fire safety awareness should be emphasized to all participants regardless of the materials used in installation of insulation retrofits.



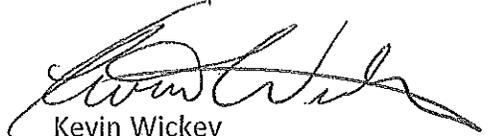
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