



July 23, 2007

George Barney
Senior Vice President
Market and Development and Technical Services
Portland Cement Association
5420 Old Orchard Road
Skokie, IL 60077-1083

Dear Mr. Barney,

I am writing you in response to your March 16, 2007 letter pursuant to Section 515 of P.L. 106-554 (the Information Quality Act) that the National Institute of Standards and Technology (NIST) received on March 20, 2007. Your letter requested correction of information disseminated by NIST and the U.S. Department of Energy (DOE) and its Energy Efficiency and Renewable Energy Office (EERE). For the reasons explained below, NIST is denying your request to correct the report titled "Investigation of the Impact of Commercial Building Envelope Airtightness on HVAC Energy Use," NISTIR 7238 before continuing to disseminate it.

Your letter raises two specific issues that question the objectivity of the information presented in the report. These issues are responded to individually below.

1) PCA's request for correction describes the NIST report as attempting to explain the effect of three different airtightening retrofit technologies: liquid-applied elastomeric coating of a masonry back-up wall, application of durable tape to frame wall sheathing joints, and upgrading from residential to commercial grade "house wrap" in a frame building. PCA is concerned that the report only considers these measures as applied to the opaque portions of the walls and not to other potential air leakage sites.

NIST Response: NISTIR 7238 is more accurately described as an effort to estimate the energy impacts of reducing the air leakage of commercial building envelopes rather than an examination of any particular means of achieving these reductions. The three technologies are presented in the context of standards currently under development that define several compliance paths for envelope airtightness, only one of which is material airtightness. Material airtightness is only relevant to opaque portions of the walls. Therefore, the report does not consider doors, windows, other penetrations and joints in the context of these three technologies. The report makes clear that the three technologies discussed are merely examples of compliance with a material airtightness requirement.

2) PCA is concerned that the database used to evaluate the improvements in air leakage "... were constructed prior to the availability of the latest energy code requirements..." and therefore the buildings on which the air leakage values in the

study are based "... may have air leakage rates that are significantly greater than buildings built to present day code requirements."

NIST Response: The airtightness values in the study are based on a database that includes all the existing commercial building airtightness values. NIST has been assembling and maintaining this database since the late 1990s and has closely examined these data for dependencies of building airtightness on construction, building type and building age. As was noted in the attachment to PCA's request for correction, we agree that our report cannot be construed to represent new building stock. However, we also agree with the statement that there is no evidence that newer commercial buildings are better (or worse) than old buildings in terms of air leakage. While a more comprehensive collection of data would be helpful in confirming the lack of such a trend with greater certainty, there is no evidence to suggest that one exists. With respect to changes in energy codes, it should be noted that the air leakage requirements in ASHRAE Standard 90.1, on which these codes are based, are qualitative in nature and have not changed to any significant degree since the first version of the standard was published in 1975. Therefore, there is no reason to expect the newer codes to result in tighter buildings.

In conclusion, NIST is denying your request for correction because the report was meant to show examples of potential energy cost savings that could be achieved by using certain technologies under certain conditions, and because the report was based on the best data available.

If you are dissatisfied with this decision, you may submit an appeal within 30 calendar days of the date of this initial decision. Such an appeal must be made in writing and addressed to:

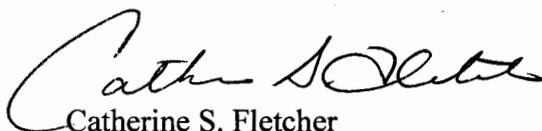
Deputy Director
National Institute of Standards and Technology
100 Bureau Drive, Mail Stop 1000
Gaithersburg, MD 20899-1000

An appeal of an initial denial must include:

- a. the requester's name, current home or business address, and telephone number or electronic mail address;
- b. a copy of the original request and any correspondence regarding the initial denial; and
- c. a statement of the reasons why the requester believes the initial denial was in error.

Thank you for your interest. If you have questions or concerns, you may contact me at info.quality@nist.gov. Please refer to http://www.nist.gov/director/quality_standards.htm for additional information.

Sincerely,



Catherine S. Fletcher
Chief, Management and Organization Division