

2018 IMC – IRC-M PUBLIC COMMENTS

RE IRC Sec M1602 (Return and Supply air balance)

No attachment was included. The comment was made for the 2015 Code review cycle. *The code as written would disallow systems where the amount of RA from a space exceeded the amount of SA. The proponent feels that this would disallow using air transfer to supply spaces. While this may be acceptable in some spaces, doing this on perimeter spaces could result in them becoming negative and allowing outside air infiltration.*

If this comment is accepted, the language would revert to the language adopted by the RAC in the adoption of the 2015 Code which was:

Amend Section M1602, item 2:

*" 2. The amount of return air taken from any **perimeter** room or space shall be not greater than the flow rate of supply air delivered to such room or space."*

Recommend 2018 Modification (maintains the PA agreed 2015 language):

*Item 2. The amount of return air taken from any **perimeter** room or space shall be not greater than the flow rate of supply air delivered to such room or space.*

RE: IRC Sec M1505.4.2 (System controls.)

The comment is to add to section M1505.4.2, Controls must be identified as "Whole house ventilation"

Recommend REJECT COMMENT and adopt as written in 2015 code

The section only deals with whole house fans and adding that wording adds nothing to the system.

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RE: IRC SEC M1601.1.2 (Under-ground duct systems)

The comments do not recommend adoption because additional testing (cost + timing) for ductwork considered inside of conditioned space. Proper sealing is already required.

Recommend REJECT COMMENT and adopt as written in 2015 code

The TAC recommends rejecting the comment. Underground ducts are outside the conditioned space. Leakage from underground ducts has been a common problem and lack of testing exacerbates the issue

RE IRC Sec M1601.1.1(8) Above-ground duct system

Comments is not to adopt M1601.1.1(8) into the PA UCC. Remain on current language.

Reason: Would require access panels in ceilings of finished areas at each of these locations (example: in ceiling of 1st floor of slab unit if trunk line and runs are located between floors). Most adjustments to flow are handled at the register location.

Recommend REJECT COMMENT and adopt as written in 2015 code

The TAC recommends rejecting the comment. Adjusting at the register is not proper balancing for duct systems.

RE: IRC Sec M1503.6.2 Makeup air dampers

Comment is not to adopt M1503.6.2 into the PA UCC. Remain on current language. Reason: New language could require further testing to show the damper is compliant if no listing mentioned.

Recommend REJECT COMMENT and adopt as written in 2015 code

The section is very descriptive and no listing is mentioned.

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RE: IRC SEC M1502.4.2 Duct installation

Comment is not to adopt M1502.4.2 in the PA UCC. Remain on current language. Reason: Current language does not include the last sentence about deformation. A small dent due to handling could be a deformation and should not create a code violation.

Recommend REJECT COMMENT and adopt as written in 2015 code

Eliminating section could allow round duct to be deformed to oval changing friction characteristics

RE: IRC Sec M1502.3.1 Exhaust termination outlet and passageway size

Comment is not to adopt M1502.3.1 into the PA UCC. Remain on current language. Reason: M1502.3.1 - Current language of 4" nominal is consistent with other sections of the mechanical code. Who will be checking to see if the crimped pipe at joint actually meets or exceeds the 12.5 sq inches? 4" nominal is 12.56 sq inches.

Recommend Modify to read:

M1502.3.1 Exhaust termination outlet and passageway size. The passageway of dryer exhaust duct terminals shall be undiminished in size and shall provide an open area of not less than **12 square inches** (7742 mm²).

So long as standard transitions are used, area should be maintained - Prevents deforming duct to meet outlet.

RE: IRC Sec M1305.1.3.2 Pit locations

Comment is not to adopt M1305.1.3.2 into the PA UCC. Reason: Existing language is sufficient and clearer.

Recommend REJECT COMMENT and adopt as written in 2015 code

Section was added to prevent direct contact of equipment with earth when installed in below grade pits.

RE: IRC Sec 1602.2. Return Air Openings

TAC feels that the residential application is not as sophisticated as a commercial application. In addition, the way the current language is framed it may not perform as intended.

Recommend Modify to read:

(5) Return air shall not be taken from indoor swimming pool enclosures and associated deck areas except where such space is dehumidified with a dedicated system specifically designed to serve such a space.