An article appearing in *Metal Construction News* February 2003 entitled "*THE IMPORTANT LIMITATIONS OF TESTING PROCEDURES: ASTM E-84 – A CASE IN POINT" was written by James Lathrop, a consultant for NAIMA.* On the surface the article seems to be addressing problems with test methods, when in reality it is another attempt by NAIMA to discredit competitors.

Who is NAIMA? The letters stand for North American Insulation Manufacturers Association. You would believe that they represent all of the insulation industry with members from all types of insulation materials. This is not so! The members of NAIMA are fiberglass and rock wool manufacturers, no one else. They should at least call themselves FIMA. The members can build their hidden agendas and release them to the public, looking as though they are representing the entire insulation industry. In reality it is their own marketing agenda. I only hope that you, our friends and colleagues, see this for what it is and look for the facts, not the drama.

Safety or Profits? NAIMA has long challenged the thermal performances of reflective insulation products, with no success. It is in our opinion that the purpose of this propaganda is to do enough damage to ESP so that the fiberglass industry doesn't lose any more market share. Low-E insulation products have been manufactured and marketed in the US for more then 13 years. It appears that we are gaining too much acceptance and NAIMA feels threatened. When ESP questioned a representative of the fiberglass industry about the allegations, his response was "You appeared on our radar".

This is not a new tactic , a few years ago the fiberglass industry attacked the cellulose industry in much the same manner. First, releasing a damaging video, then articles and letters to building code officials, creating fear and doubt, the foundation for propaganda. Just like they are doing now. Did Cellulose also appear on the radar?

What is disturbing is the misleading interpretation with regards to ASTM and it's standards. Many people, including architects, engineers, manufacturers and builders, volunteer their time and resources to ensure that the ASTM standards which are adopted, are accurate, fair, and deliver the intended results

The ASTM E-84 test mounting method using rods and mesh was adopted in 1968 for the fiberglass industry (NAIMA) and is now not acceptable. According to NAIMA it is o.k. to test a competing product and if the test does not deliver the desired results, then it is alright to change the procedure to get the results you desire. A quote from an Owens Corning fax stated "We use these pieces (tests) to position our metal building fiberglass insulation. This is a tool for our sales reps."

ASTM E 84 requires the use of steel rods and hexagonal wire netting. When a material falls from the original test position to the bottom of the Steiner Tunnel, it will be re-ignited by small pieces of burning material. This means that the material is subjected to a second ignition source after the test has already started. When reflective insulations are installed, they are supported by roof purlins or other attachment devices because they are flexible and will fall if not supported. They simply fall into the fire. Ken Rhodes of UL stated: "If the material simply fell down into the flames without support, that doesn't seem like a fair test' He went on to say, "insulation draped over the purlins would probably count as supported".

ASTM E-84 states “This guide has been compiled as an aid in selecting a method for mounting various building materials in the fire test chamber. These mountings are suggested for test method uniformity and convenience; they are ***not meant to imply restriction in the specific details of field installation”.***

If NAIMA's types of procedures were adopted, there would be no credibility for the test because everyone could manipulate tests. This would prevent new products and small companies from entering the market place and securing their part of the American dream. This is just one reason why ASTM and their test methods have been adopted and are necessary and should not be manipulated.

The ASTM E-84 standard was officially approved in 1961. It has been repeatedly updated and revised to improve the testing process and to come as close to real world applications as possible. The most recent revision took place in 2001.

Low-E insulation products have been tested with the accepted E-84 test criteria at U.S.Testing, Johns Manville and Omega Point Labs, passing favorably.

The fact is, LOW-E™ insulation passed the closed room burn test, which NAIMA’s consultant, states “is widely accepted as a more accurate reflection of field conditions for building products.” The test report stated, “Neither excessive smoke or flaming occurred” The conclusion of the test was “The material is acceptable in accordance with UL. Standard 1715, and Uniform Building Code Standard 17-5.” I guess from here they will come up with some reason as to why this test shouldn't count either.

NAIMA’s consultant, quotes E-84 as saying “this test does not by itself incorporate all factors required for fire-hazard or fire-risk assessment of the materials, products or assemblies under actual fire conditions”

This statement can be found verbatim in nearly every ASTM standard relating to fire. The list includes everything from upholstered furniture and mattresses, to electrical wiring and radiant heat.

NAIMA’s consultant, Mr. Lathrop states,“do not rely on manufacturer’s claims, which contain only general information.” This goes for all products not just reflective insulations.

ESP has always provided in depth testing and installation information, we pride ourselves on this. Our products are safe and non-toxic; We have no known carcinogens and have no chemicals in our products that are harmful to man such as formaldehyde.

Mr. Lathrop, NAIMA’s consultant, states “ask for copies of the test report”; you can find these on our web sight www.low-e.com.

The article in February’s Metal Construction News, certainly made some unique comments. Consider this, In the above referenced article, Mr. Lathrop, a NAIMA consultant states: “Often specifiers, manufacturers of building materials and building officials rely on results of tests conducted IN ACCORDANCE with ASTM or other test standards without taking into consideration the limitations of those standards”.

Since all laboratory tests have limitations, is NAIMA actually suggesting that even when a product is tested within the strict accordance of these ASTM standards that this group of people should not consider them reliable? *If* this is so, then what else do you and I have to rely on?