



*Representing the Propane Gas Industry for
Alaska, Hawaii, Oregon and Washington*

Date: September 15, 2010
To: Residential Specialty Code Committee
From: Pacific Propane Gas Association
Re: Code Change Proposal ORSC 11-30, Section G2445.8 Moisture Control

The Pacific Propane Gas Association is opposed to a proposed amendment being considered at the Oregon Residential Specialty Code meeting under Chapter 24 - Fuel Gas on September 15, 2010, and we would like to explain our position. Founded in 1961, the Pacific Propane Gas Association represents propane marketers and related businesses throughout Alaska, Hawaii, Oregon and Washington. PPGA maintains its core principles of education, safety and training to promote high standards of practice in the propane industry, and to help its members compete in the energy marketplace.

At issue is Code Change Proposal ORSC 11-30, Section G2445.8 Moisture Control. The proposed language would require that a dwelling utilizing unvented room heater(s) shall provide the occupancy space with automated humidity controls.

The proponent answered "no cost impact" to question 10 regarding creation of adverse fiscal impact to the general public, and answered "minimal increase, varies by ventilation and controls used" to question 11 regarding housing cost impact statement. We certainly disagree with the applicant's responses to questions 10 and 11. We don't believe that humidity controls are typically installed in new homes. According to Bruce Swiecicki, P.E., Senior Technical Advisor for our National Propane Gas Association, the 2009 International Energy Conservation Code does not require humidity control.

As independent propane dealers, we are very sensitive to our customers' needs and situations. Many times elderly folks install unvented heaters in older homes in-lieu of the more expensive cost of vented heaters systems. To add the cost and logistics of requiring a humidity control system could add a considerable amount of burden. We believe this change if approved will dramatically hurt the sales of unvented heaters and deprive those of limited income of a much needed choice for heating.

We presume that such a humidity control system would require either turning on an external exhaust fan which would exchange dryer outdoor air for indoor air – raising the fuel cost since the heater would be required to heat the external air, or the control system would shut off the heater until the humidity would drop - defeating the purpose of the heater. The moisture problem usually occurs in homes that are very air tight, which isn't usually the case with older homes. Conversely, the tighter a home the less the heat demand, the shorter period of time the heater operates, and the less humidity is added to the air. Additionally, moisture issues are exacerbated if an oversized heater (ratio for cubic room space vs. BTU) is utilized.

There are a number of scientific studies on this issue, and we would be happy to provide more information on them. The Whitmyre/Pandian/Aronov study found that vent-free products don't foster mold growth. Other studies by Wilson Environmental, the University of Illinois, and the Gas Research Institute, which included considerable measurement of actual emissions inside houses using vent-free gas logs, also concluded that humidity isn't a problem.

However, as dealers our primary concern is for our clients and their ability to choose. We believe that this amendment would drastically curtail most people's ability to afford this choice of heating, which would be detrimental to the segment of Oregon's population that depends on them in this uncertain economic environment.

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