

OWENS CORNING

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HERBERT SLONE

REGISTERED ARCHITECT
TECHNICAL MANAGER
COMMERCIAL INSULATION



November 2008

Re: LEED Credit for Materials Extracted, Processed and Manufactured Regionally

Owens Corning (OC) manufactures Foamular® Extruded Polystyrene Insulation. For competitive reasons, Owens Corning chooses not to disclose raw material suppliers for Foamular. On LEED reporting forms, this line is typically completed, "Not Disclosed". However, the LEED assessment for the project can still be completed. OC realizes that our choice to "not disclose" causes Foamular to not contribute to the regional materials calculation in LEED. As a practical matter, any foam plastic insulation contributes little value to the LEED "regional materials" calculation for the following reasons.

- The regional materials calculation is a weight and cost based calculation. Even if included, foam plastic products like Foamular contribute little relative to the entire project calculation compared to other heavier and more costly materials like steel, glass, concrete, etc.
- Foamular is a polymer chemistry product made from ingredients provided by highly specialized producers that are relatively few in number. For that reason, suppliers for various components come from as far away as China. Others come from Canada, Montana, Louisiana and places in between. For a given shipment of Foamular, portions of the raw material components are likely to ship from places greater than 500 miles away from a given job. For those cases greater than 500 miles, the credit is not available anyway.
- To insure supply stability, each of the six raw material components in Foamular comes from multiple suppliers. For a given shipment of Foamular, it is difficult to assess the origin of each component ingredient. For example, we have suppliers of polystyrene from Massachusetts and Louisiana supplying the same plant. The raw polystyrene component materials are stored in silos and, for a given run of product, a given raw material could be from a couple of different locations. The finished product is warehoused and inventoried for shipment at a later date. It is not segregated in the warehouse by raw material supplier. When loaded on a truck, for a given run of foam, it is difficult to guarantee which raw material source was used for a particular shipment to a particular job.

Further, each plant has their own list of suppliers, some in common with each other, some not. It is quite a record keeping and inventory management chore to be faithful to the intent of LEED and guarantee particular raw material components to a particular job.

This is a realistic assessment of OC's raw material supply situation. It is very common in the foam plastic industry and is probably true for many product manufacturing situations. Any producer that represents otherwise is either very fortunate to have predictable single sources of raw material supply, or, is greatly oversimplifying their representation of raw material source management.

I hope our position is clear and accepted.

Sincerely,

A handwritten signature in black ink that reads "Herbert Slone". The signature is written in a cursive, flowing style with a large initial "H".

Herbert Slone
Registered Architect
Technical Manager
Commercial Insulation