



7 Need-to-Know Code and Regulatory Updates



Tom Culp Owner, Birch Point Consulting NGA Energy Code Consultant



Urmilla Sowell Vice President, Advocacy & Technical Services National Glass Association MARK YOUR CALENDAR FOR THESE OTHER UPCOMING EVENTS

NGA Glass Conference: Isle of Palms | Charleston Feb 5-8, 2024 | Isle of Palms, SC

Building Envelope Contractors (BEC) Conference Mar 3-5, 2024 | Nashville, TN

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Wild Dunes Resort | Isle of Palms, SC February 5-8, 2024



GLAZING EVOLVED.



March 3-5, 2024 Nashville glass.org





Glass & Glazing Advocacy Days May 14-15, 2024

glass.org/advocacy/initiatives/priority-issues



#1 Energy Star Version 7

- For windows, doors, and skylights in lowrise residential buildings 3 stories or less.
- Now in effect! (as of 10/23/23)



Windows



Energy Star Version 7

- Aggressive, especially in the North, but the technology is there:
 - 4th surface low-e
 - Triple glazing (both thin triples and normal triples)
 - Medium or higher SHGC low-e in the north.
 - Latest generation triple silver low-e in south and south-central.
- Colorado has new law requiring residential windows, doors, and skylights to meet Energy Star criteria.



- Treated like an appliance standard manufacturer cannot sell unless qualifies.
- Questions about high altitude products and argon / krypton gas fill ... but there are solutions ...

pre-equalized IG units, mylar bags for transport, flexibility from high SHGC low-e.



#2 Bird-Friendly Glazing Requirements

About 1,000 birds killed after colliding into McCormick Place Lakeside Center in one 'tragic,' deadly night

The alarming death toll is just part of a larger danger facing migrating birds.



Chicago Sun Times Oct. 6, 2023, by Kaitlin Washburn, Photo by Pat Nabong

This N.Y.C. Building Is in the Bird-Killing Hall of Shame. It Wants Out.

A shiny glass condo property in the city has become notorious for deadly crashes, so some residents are pushing for change.



#3 Embodied Carbon and EPDs

- Over 340 cities, states, and federal government have **decarbonization** policies and specific emission reduction targets.
- This has led to:
 - Updated code adoption
 - New stretch energy codes (MA, NY)
 - Expansion of Building Performance Standards (e.g. New York LL97, DC, CO, WA, St Louis, ...)
 - "Buy Clean" policies setting embodied carbon (CO2eq) / GWP limits for construction materials, requiring Environmental Product Declarations (EPDs)





GSA Embodied Carbon in Federal Projects

GSA / Federal Buy Clean Initiative

- GSA setting GWP CO2eq limits for procured materials in governmental projects, including glass, asphalt, concrete, steel.
- Initially included *flat glass, processed glass,* and *IGUs,* but after hearing concerns about lack of downstream EPDs, GSA agreed to focus only on *flat glass*.
- They also allow construction assemblies, such as a window or curtain wall, to qualify if EPDs covering 80% of the assembly cost or weight are submitted. Minor parts (sealants, hardware, fasteners, spacers, etc) can be ignored.
- In other words, can just hand in the flat glass EPD, as that covers the bulk of the carbon impact.
- Starting with a scaled down 6 month pilot program on 11 specific projects (\$300M of material procurement) before making further adjustments.





Embodied Carbon in California

• Buy Clean California

- Sets maximum CO2eq limits for structural steel, flat glass, mineral wool board insulation in state-funded projects.
- Flat glass only (not downstream fabricated products), but must be product-specific and facility-specific EPD.
- Just recently expanded embodied carbon requirements under CALGreen
 - Both public and private commercial buildings over 100,000 ft² and schools over 50,000 ft²
 - Must either do whole building life cycle analysis (LCA), or meet prescriptive CO2eq limits for concrete, steel, flat glass, mineral wool.
 - If choose EPD path, only require EPD for unfabricated material (not downstream assembly), but must be either product-specific or factory-specific.





Embodied Carbon in Colorado

- Using both stick and carrot.
- Buy Clean Colorado Act: starting Jan 1, concrete, steel, asphalt, flat glass procured for state-funded projects must meet max CO2eq limits.
- For private sector, also establishing a Sales and Use Tax Exemption program for qualifying building construction materials.
 - Must meet same CO2eq limits as above.
 - Considering a proportional tax exemption for assemblies (e.g. % of glass in a window).
- Both require product-specific EPDs, but not facility-specific.





Embodied Carbon in Green Building Codes

- 2023 version of the green building code (ASHRAE 189.1 / IgCC) is also expanding EPD requirements:
 - Provide ≥ 20 EPDs for different products representing at least 25% of building material costs. Industry-wide EPD is okay.
 - Provide ≥ 10 product-specific EPDs representing at least 10-15% of the building material costs with GWP within 125% of the industry-wide average.
 - Allow EPDs for components to be submitted for assemblies if cover > 80% of product weight or cost.
 - Whole building LCA is also an option.



Embodied Carbon and EPDs Bottom line ... what do you need to know?

- The CO2eq number is not the issue it's the question of EPD availability.
- When asked about embodied carbon or EPD, simply hand in the NGA industry-wide EPD for flat glass.
- If need a product-specific EPD (e.g. GSA, CO, CA), simply hand in the EPD from your primary glass supplier.
- If need one for framing, the Aluminum Extruders Council also has an industry-wide EPD for aluminum extrusions with thermal breaks and different finishes.









Enhanced Forced Entry Standards – Voluntary

ASTM F3561 – glass is weakened with ballistic attack, then impacted multiple times with a 100 lb. impactor.







#5 Energy Efficiency: Building Performance Standards and Stretch Codes

- ASHRAE 90.1 and IECC continue to advance towards their net-zero energy goals in 2030-2031.
- However, some states and cities are moving *much* more aggressively and quickly.
 - Building Performance Standards affecting existing buildings.
 - Stretch Energy Codes affecting new construction.
- How will these affect our industry good, bad, or both?



Building Performance Standards *expanding rapidly!* Local requirements setting **energy use limits on EXISTING BUILDINGS**.

- Building Performance Standards have been enacted in:
 - New York City (carbon limits starting 2024)
 - St. Louis (energy use limits starting 2025)
 - Boston (carbon limits starting 2025)
 - Washington State (energy use limits starting 2026)
 - District of Columbia (energy use limits starting 2026)
 - Colorado (limits still in development, but targeting 2025)

Fines start 2025-2026 ... but building owners have already started planning

Large incentive to upgrade existing buildings; improves economics of envelope retrofits.



Replacement glazing
Replacement windows
Secondary glazing
Low-e storm windows

National Building Performance Standards Coalition

- Expanding rapidly.
- These locations are trying to pass a building performance policy by Earth Day 2024.
- Good opportunities for envelope retrofit projects.



National Building Performance Standards Coalition May 2023

Stretch Local Energy Codes

New York Advanced Energy Code (still under development)

• They keep changing, but likely U-0.28 fixed, U-0.32 operable (compared to 0.34 fixed, 0.45 operable in 2024 IECC)



- \rightarrow Aggressive but achievable:
 - Triple glazing in a normal thermally broken aluminum frame, or
 - Double glazing with two low-e coatings (#2 and #4 surfaces) in a higher performance thermally broken frame.
- Does include flexibility for trade-offs in performance path



Stretch Local Energy Codes

Massachusetts Stretch Code

 Other than commercial buildings < 20,000 ft², must demonstrate very aggressive overall building performance and glazed wall systems must meet <u>mandatory</u> 0.25 U-factor.



(compared to 0.34 fixed, 0.42 operable in 2024 IECC and 9.1-2022)

- Can't be traded off even if show equivalent overall energy performance.
- → In most cases, triple glazing in high performance thermally broken frame, as well as high performance spandrel.
- NGA is a Leaders Circle sponsor of research with the Charles Pankow Foundation to improve modeling of spandrel performance involving SGH, MH, RDH, ORNL, LBNL.



Stretch Local Energy Codes

Seattle

• Base requirement U-0.34 fixed, U-0.36 operable for curtain wall, storefront, AW windows. (U-0.26 for nonmetal windows)

That part is easy ... BUT ...

- 20% of fenestration area must meet higher performance level of U-0.22 fixed, U-0.26 operable (U-0.20 for nonmetal windows)
- Still required even in performance path.
- → Extremely aggressive: triple glazing in highest performance thermally broken frame, or nonmetal.



How will architects and building owners respond?

- Help transition the market to triple glazing and vacuum glazing? (Will building owners pay for it?)
- Or cause some to reduce windows and do bad building design in terms of 'new age brutalism'?
- What is the future of net-zero buildings: Jetsons or Flintstones?



#6 Heat Treatment and Edge Grinding



- ASTM C1048: fabrication techniques that alter the glass surface, thickness or edge shall be performed prior to heat treating to avoid a reduction in glass strength
- ASTM C1172: fabrication techniques should be performed prior to heat treatment
- NGA GTP Heat-treated Laminated Glass Exposed Edges
- NGA GTP The Importance of Fabrication Prior to Heat-Treatment



Heat-Treated Glass Compression and Tension Zones

NGA Study: Test Procedure for Edge Grinding of Laminates Post-Tempering

Does post-tempering edge grinding actually reduce laminate strength?

What depth of post-tempering edge

grinding preserves laminate strength?





- To reach net-zero energy, need both energy efficiency and on-site renewable energy.
- ASHRAE 90.1-2022 and 2024 IECC now have minimum requirements and credits for on-site renewable energy.
- Green codes require even more.
- Includes photovoltaics: rooftop solar, ground based PV, and BIPV



Glazing for On-Site Renewable Energy Production

• BIPV (Building Integrated Photovoltaics) in overhead glazing, opaque spandrel, sun shades, and *now vision glazing!*



 \rightarrow Look for opportunities to include and promote BIPV in your products and projects.

Session Key Points

- **#1** Energy Star Version 7
- **#2** Bird-Friendly Glazing Requirements
- **#3** Embodied Carbon and EPDs
- #4 School Security
- **#5** Energy Efficiency: Building Performance Standards and Stretch Codes
- **#6** Heat Treatment and Edge Grinding
- **#7** On-Site Renewable Energy







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