

SWS Variance Request Form
(complete one form for each request)

Proposed State Standard	The State of Montana requests that water heaters be wrapped with an R-10 or better insulation.
Relevant SWS(s)	SWS 7.8103.1c
Objective of Relevant SWS	The SWS 7.8103.1c requires that DWH tanks be insulated to a minimum of R-24, unless the SIR to add insulation is less than 1.0. The objective is to reduce standby losses from tank piping and storage tanks.
Difference between Proposed and SWS Language	Instead of requiring R-24 insulation, this variance proposes using R-10 or better insulation wrap or commercially available water heater wrap kits.
Specific Conditions Where Variance will Apply	This variance will apply to any water heater wrapped in the state of Montana for the Weatherization Assistance Program.
Reasoning/Justification (Include supporting technical materials as appropriate)	The primary reason for this variance is clearance requirements and practicality of installation. The requirement for R-24 insulation is difficult to install and impractical to install efficiently and easily while maintaining required clearances as well as strapping requirements. The second reason is the lack of local availability in Montana for water heater wrap kits rated to R-24; the R-10 kits are readily available and have already been purchased in bulk by many Montana Agencies. These kits are easy to install and provide enough clearance in tight spaces such as a mobile home water heater closet or a small mechanical closet in a stick built home.

DOE Review Notes:

Required Signatures:

Marcia Lemon

Grantee Representative submitting request

2/11/2016

Date

DOE Technical Approval

Date