



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

ASSISTANT SECRETARY FOR HOUSING-
FEDERAL HOUSING COMMISSIONER

April 21, 2014

Dear IPIA Agency Administrator

In a number of recent audits completed by IBTS, the following issue has been written: Temperature monitoring of foam adhesive in accordance with the foam adhesive manufacturer's installation and storage instructions.

From reviewing these audit findings, it appears that manufacturers and IPIAs may not be adequately monitoring or have temperature controls in-place to assure that adhesive foam is being installed in accordance with the foam manufacturer's installation instructions. The controls outlined by the foam manufacturer typically include the following temperature elements:

- Ambient air temperature at the time of foam application
- Substrata (material) temperature at the time of foam application
- Storage temperature of each 2 part mixture
- Temperature of the foam
 - At the heater block
 - In the hose

(The above list is representative and not meant to be complete as other considerations may be addressed in specific foam manufacturer installation instructions.)

In the process of assuring the compliance of each home, each home manufacturer should have an accountable person who is responsible for monitoring compliance with adhesive foam temperature controls. The monitoring of the foam temperature controls should also be documented by the accountable person. Foam application can be inspected in-place on the home, but without the additional checking of the mixing process and the temperature controls; the quality of the foam application cannot be adequately assured.

The installation instructions should be available and accessible to production line personnel. All training and training manuals should include this component. In addition, the manufacturer should verify that the Quality Assurance Manual references these installation instructions.

Accordingly, the Department is requesting all agencies to assure that required temperature controls for foam adhesives are in place at all manufacturing facilities in accordance with the applicable foam adhesive manufacturer installation instructions. Please distribute this letter to the manufacturers that you service. If you have any questions regarding this issue, please call or email your PIA contact in this office at (202) 708-6423.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Beck Danner". The signature is fluid and cursive, with the first name being the most prominent.

Pamela Beck Danner
Administrator
Office of Manufactured Housing Programs