# PULLMAN &COMLEY

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March 6, 2023

Via E-Mail

Melanie Bachman Executive Director/Staff Attorney Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re: PETITION NO. 1426 – DG Connecticut Solar, III, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.9-megawatt AC solar photovoltaic electric generating facility located west of the Ellington town boundary at 341 East Road, East Windsor, Connecticut and associated electrical interconnection.

Dear Ms. Bachman:

I am writing to provide you with an update regarding noise concerns associated with the abovereferenced solar facility (the "Facility"). The purpose of this letter is to inform the Council of the results of a solar power acoustics study conducted for the Project (the "Report"). (Attached to this letter as **Exhibit A**). The Report analyzed noise levels emitted during all hours of operation of the Facility and concluded that operation of the Facility is compliant with the R.C.S.A. § 22a-69-1 *et seq.*<sup>1</sup>

Notwithstanding compliance with the applicable regulations, and as the Council may be aware, the Facility is currently considering sound control options to further reduce noise levels. The Report states that one sound control option could potentially consist of an open shed, which would reduce sound levels by over 20 dBA at the nearest residential property line. This would decrease the noise level to below ambient background levels, thus making operation of the Facility inaudible. Other options are also being considered, and no definitive plans have been made for whether changes will be incorporated into the Facility, and if so, what features would be included. However, it should be noted that because the current Facility D&M Plan is in full compliance with the R.C.S.A.

<sup>&</sup>lt;sup>1</sup> The Facility is not operated at night, and thus the Report did not analyze nighttime noise levels, since none are anticipated to be generated.

## Page 2

§ 22a-69-1, additional sound control designs are not mandatory. If additional sound measures are to be incorporated at the Facility, the Facility's D&M Plan would obviously need to be amended.

In addition, we would like to provide you with an update as to the vegetative buffering that is taking place at the project site. Given the season, the Project cannot ascertain what, if any, vegetation has died over the winter. However, the Project plans to replace any dead vegetation, as necessary, during the upcoming growing season.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Certificate's Service List as of this date.

Sincerely,

Lee D. Hoffmin



## **Brooks Acoustics Corporation**

35 Talcottville Road, Suite 31 Vernon, Connecticut 06066 860-896-1081

Mr. Bradley J. Parsons, PE, PMP Director of Design and Permitting Verogy 150 Trumbull Street, 4th Floor Hartford, CT 06103 20 June 2022 PJ2022-1390-L01

Subject: Solar One East Windsor – Solar power acoustics studies

Dear Mr. Parsons:

As requested, Brooks Acoustics Corporation (BAC) has conducted an acoustical engineering and design study to evaluate the sound emissions from the existing Solar One facility on Middle Road in East Windsor, Connecticut, and any impact that those sounds may have on the surrounding neighborhood. As part of this study, sound survey tests were conducted to determine if the facility is operating in compliance with the Regulations of Connecticut State Agencies (RCSA) Section 22a-69-1 et seq. ("Sound Regulations").

Measurements were made of the sound levels and tonal spectra attributable to the facility at the nearest residential property line during daytime (sunlight) hours.

Based on these sound survey test data, it was determined that the Solar One facility *meets the CT State sound level limit regulations.* Therefore, the facility is expected to be compatible with Connecticut Siting Council requirements.

Although the facility was found to be in compliance with CT Sound Regulations, a sound control design was developed which will further reduce the emitted sound levels which may reach residences in the vicinity. The sound control design features an open shed which faces to the south, away from the nearby residences. Acoustical engineering calculations were made for the expected sound levels at the nearest residential property line with the sound control in place. It is the opinion of BAC that with a reasonable degree of engineering certainty the shed will reduce the sound level of the Solar One facility by about 20 dBA, to below ambient background levels. This would make the facility essentially inaudible at the residences.

### Sound Level Standards

The Regulations of Connecticut State Agencies (RCSA Section 22a – 69) require that noise emitted by an industrial land use to a residential land use shall not exceed 61 dBA (A-weighted decibels) during daytime hours, which are defined as 7:00 a.m. to 10:00 p.m. [see Sec. 22a-69-3.5. Noise zone standards (a)].

If the emitted sound possesses what is defined as an audible prominent discrete tone [see Sec. 22a-69-1.2. Acoustic terminology and definitions (r)], then the sound level which is otherwise not to be exceeded is reduced by 5 decibels [Sec. 22a-69-3.3. Prominent discrete tones].

Therefore, in the case of sound emissions which contain a prominent discrete tone, the noise emitted by an industrial land use to a residential land use shall not exceed 56 dBA during daytime hours.

According to the CT sound regulations, the emitter's zone includes all public rights-of-way [see Sec. 22a-69-1.1 (o)]. Therefore, the sound level which applies to the nearest residential receiver would be measured at the nearest residential property line, which is directly to the north across Middle Road from the facility.

## Sound Tests

Sound tests on the Solar One north property line and at the nearest residential property line were conducted on 14 May 2022. These survey tests were conducted by Bennett Brooks of BAC. The facility was managed by Brad Parsons of Verogy during the tests. Field measurements of sound levels were performed in accordance with the requirements of the Connecticut Sound Regulations (RCSA 22a-69) and with accepted standard methods of environmental noise measurement.

The test site was the Solar One facility, on the south side of Middle Road, in East Windsor, Connecticut. Across the road on the north side of Middle Road is the nearest residence, at 69 Middle Road. A view of the survey site is shown below and in Figure 1.



The sound test Position 1 was at the facility North property line. Sound test Position 2 was on the nearest residential property line located at 69 Middle Road. The sound analyzer was mounted on a tripod.



Test Position 1 – Facility N property line



Test Position 2 – Nearest residential property line

Detailed descriptions of the sound test positions are given in Table 1, attached. Additional photographs of the test locations are given below and in Figure 2.

The primary sound generating sources at the Solar One facility are the DC to AC power inverters. These units convert the 12 volt DC power produced by the solar panels to the AC power used by the power transmission grid. The inverters emit a humming sound. They also have cooling fans which run depending on the unit temperature and emit a whooshing sound. Three banks of inverters are located on the north side of the facility.

During the sound survey the Solar One facility was operating at near full power capacity, as the sky was sunny, although somewhat hazy during that time. Therefore, the power inverters were operating near full load capacity.

The primary field acoustic measurement system was a digital precision (Type 1) integrating logging sound level analyzer (NTi XL2). This acoustic measurement system was calibrated by a third-party laboratory with equipment directly traceable to the U.S. National Institute for Standards and Technology (NIST). The instrument was also field calibrated both before and after each test. The nominal accuracy for the measurement system is ±1.5 dB. A listing of the test equipment used in this survey is given in Table 2.

During the sound survey tests, the NTi instrument continuously recorded the sound level and computed the energy average level, Leq. Also, the instrument stored statistical and spectral acoustic parameters for the test period, updating those values every second. Sound recordings were also made.

The acoustics measurement test protocols for the test instrument system were set to use ANSI standard A-weighting for frequency, and slow time weighting. For these tests, sound was measured continuously, with sample overall, spectral, and statistical sound level values recorded at 1 second intervals. The property line tests were 5 minutes in duration. The internal clock of the NTi instrument was synchronized with the NIST atomic clock within a tolerance of 1 second.

The sound tests were attended by the observer (Brooks) who operated the instrument for the survey. During the sound test survey, observation logs and notes were written identifying test procedures and significant sound generating events.

## Data analysis

In this analysis, measured sound levels are given in terms of standard decibels, or "dB". These sound levels were A-weighted using standard digital filter networks.

Sound level measurements which apply **A-weighting** are designated by the symbol **"dBA" or "dB(A)"**. The A-weighting filter mimics human hearing sensitivity and is used for assessing the impacts of sounds on people. The A-weighted levels are also designated in the sound level limits mandated by the CT Sound Regulations.

### Time history analysis

Detailed temporal (time history) sound test results are given in the form of a **Time History Chart**, which shows the change in sound level over time for each test record.

Time history analysis of sound data can be very helpful for understanding the character of the tested acoustical environment. Simply stated, the sound level time history indicates the sound level that is measured at any given moment of time during the test period.

In this analysis, the sound time history for the test is represented by a chart showing how the measured sound levels varied with time. A steady sound such as a constant fan will appear to be more of a flat line on the chart, while variable sounds of shorter duration such as passing vehicles will appear as a series of peaks and valleys on the chart.

The sound survey time history analyses show the variation in sound level for the test periods, in 1 second sample segments.

### Statistical analysis

Measured sound survey data are presented in terms of statistically derived sound level parameters, to quantify the sound levels at the Solar One facility.

For a particular test period, sound levels may fluctuate due to the variation of sound source signals which are received at that location. In the case of these sound surveys, sound level fluctuations occurred due to the presence of natural sources, such as birds, insects and rustling leaves, and also during times when other sound sources were present such as machinery, road traffic and aircraft operating in the area.

An analysis was conducted to provide statistically derived acoustic data quantities, in a similar way for each test record. These statistical quantities are useful for characterizing environmental sound in terms of its steadiness, or variation with time.

An example of a statistically derived quantity is the LA<sub>90</sub> level, also called the LA90 level. This is the A-weighted sound pressure level that is exceeded 90 percent of the time over the duration of the data sample period. Note that the LA90 background level represents the sound levels near the valleys over the survey period.

The LA<sub>90</sub> level is defined by the State of Connecticut as the ambient background baseline sound level. The LA<sub>90</sub> level is also indicative of the steady equipment sound in the area. The LA<sub>90</sub> level represents the sound that is attributable to the Solar One facility.

Also analyzed was the energy average sound level (equivalent level) for the test period (LA<sub>eq</sub>).

## Spectral analysis – 1/3 Octave Bands

Also included in this report are spectral sound test data.

These data are the result of a spectral analysis of the measured sound. In this analysis, the measured sound of the test record is divided into bands, known as 1/3 octave bands (OB), which range from low frequency (bass) to high frequency (treble) sounds. The sound levels associated with each of these frequency bands may be shown on a **spectrum chart** ranging from low pitch on the left to high pitch on the right, like the arrangement of a piano keyboard. The measured 1/3 OB levels may be used in an engineering analysis to determine the causation mechanisms of the sound. Also, they are used to determine the presence of a prominent discrete tone per CT Sound Regulations.

## Sound Test Results

The sound level metric used in these comparisons is the LA90 value, which is the A-weighted sound level that is exceeded 90 percent of the time during the test period. The LA90 level is defined as the background level, and incorporates contributions from distant road traffic sound sources, combined with the contributions from steadily running equipment, including the Solar One power inverters.

The sound survey test results are summarized in the Table below:

Test Location	LA90 sound level
Pos 1 – Facility N property line	48 dBA
Pos 2 – Nearest residential property line	47 dBA

Below are **time history charts** which show the measurements at the facility property line and at the nearest residential property line (across Middle road). For these test positions, the passing vehicles represent the high peaks on the graph, while the lowest valleys represent the background sound level due to the combination of sound from distant road traffic and the plant equipment.

The time history chart below represents the Position 1 (facility N property line) test.



This shows the A-weighted equivalent (energy average) sound level (LAeq), recorded at 1 second intervals, for a period of 5 minutes (fluctuating solid dark red line). The peaks and valleys represent fluctuating sound sources, such as vehicles on Middle Road, a bird, a distant lawnmower, and a propeller plane. The highest sound level during this test period was about 90 dBA due to a passing motorcycle and the lowest was about 46 dBA.

The baseline 90<sup>th</sup> percentile sound level, LA90 is shown as a flat dotted red line. This line, which is seen to skim the valleys of the time history sound trace, represents a steady sound signature due to distant road traffic and the inverter equipment operating at the Solar One facility. The LA90 value was 47.5 dBA as noted on the chart, and in the Table above (rounded to the nearest dB).

This is the sound level that is attributed to the inverter equipment. This level is also consistent with the observation of the inverters operating without other significant sound sources present at about 48 dBA.

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The time history chart below represents the Position 2 (nearest residential property line) test.

The chart for the nearest residential property line shows a fluctuating LAeq signature, like the chart for the facility N property nearby. The highest sound level during this test period was about 76 dBA due to a passing pickup truck and the lowest was about 45 dBA.

The baseline 90<sup>th</sup> percentile sound level, LA90, was 47.0 dBA, as noted on the chart, and in the Table above (rounded to the nearest dB). This is the sound level that is attributed to the inverter equipment

*Spectral charts* were made for the sound records taken at Positions 1 & 2, shown below.





Test Position 2 -- Measured LA90 spectrum

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The spectral charts show the 1/3 octave band (OB) sound levels at each test position. These are the frequency bands which are analyzed for comparison to the CT Sound Regulations definitions for a Prominent Discrete Tone.

Tones are sounds such as hums, whines or whistles and are represented as peaks on the spectral curve. Several tones are apparent on each of these spectral charts. Prominent discrete tones are represented by 1/3 OB levels that stand out above the levels of their adjacent bands to the extent that is defined by the CT Sound Regulations. Of the several tones seen in these spectral charts, two of them qualify as Prominent Discrete Tones according to the CT Sound Regulations, at 800 Hz and at 6300 Hz.

To **summarize** the findings of these test results, the sound level of the Solar One operation, which is attributable to the power inverters, was **47 dBA** at the nearest residential property line. The sound signature of the inverters displayed the **presence of a prominent discrete tone**.

### Sound impact evaluation

Measured sound test survey data show that the sound level for the Solar One facility due to the power inverters operating at the nearest residential property boundary to the North was **47 dBA** with the presence of a prominent discrete tone.

The Regulations of Connecticut State Agencies (RCSA Section 22a-69) place a limit on noise emissions of 61 dBA at residential property lines during daytime hours. There is a penalty of 5 dB for sounds which include the presence of a prominent discrete tone. The resulting **sound level limit** for the Solar One operation is **56 dBA** at the nearest residential property line.

The measured sound level attributable to the facility (47 dBA) is substantially below that limit. Therefore, the facility is *in compliance* with the sound level limit requirement of the RCSA.

## Sound control design

Although the facility was found to be in compliance with CT Sound Regulations, a sound control design was developed which will further reduce the emitted sound levels which may reach residences in the vicinity.

The sound control design features a series of open sheds built around the power inverter banks, and which face to the south away from the nearby residences. Specifications for the shed design are as follows.

The open shed shall be a wood framed structure. The shed shall be sized appropriately to comfortably encompass each inverter bank at the facility, allowing room for routine maintenance and for cooling air to circulate inside. The shed walls and roof shall extend at least 5 feet to the south of the enclosed inverter bank.

No holes, penetrations or gaps shall be allowed in the walls or roof which allow sound to escape to the sides or to the rear of the shed. Pea size gravel shall form the floor of the shed and shall be piled up to the shed wall elevation to prevent gaps under the wall.

The walls and roof assemblies of the shed shall be constructed of two layers of  $\frac{3}{4}$  inch thick tongue and groove (T&G) plywood with staggered joints such that there are no gaps, for a total wall/roof thickness of 1  $\frac{1}{2}$  inches.

The roof may be finished with ice and water shield membrane and with roofing shingles to prevent rain leakage, and the walls may be stained, painted, or finished with appropriate siding for appearance purposes.

The inside of the walls and the roof of each shed shall be covered to within 1 foot of the front opening with sound absorbent panels. These panels shall be 2 inches thick and provide a noise reduction coefficient rating of NRC 0.95 or better. An acceptable panel is the PolySorb panel at 2 inches thick. Product data for the PolySorb panel is attached.

Acoustical engineering calculations were made for the expected sound levels at the nearest residential property line with the sound control shed in place. The estimated barrier effect of the shed is shown on the attached calculation sheets.

A sound spectral graph for the residential property line position, with and without the noise control sheds in place, is shown below.



As seen in the barrier acoustical calculations (attached), the amount of sound reduction provided by the shed increases with increasing frequency, until it reaches a practical maximum of about 20 dB in the higher frequency bands.

Since the dominant amount of sound from the inverters is in the higher frequency bands, the total reduction of the shed is estimated to be about 20 dBA.

So, the shed is expected to reduce the sound level of the inverters to about 27 dBA at the nearest residential property line. This level is likely to be below the lowest ambient background level in that area of East Windsor, due to distant traffic and natural sound sources. Therefore, it is likely that with the noise control shed treatment, the Solar One facility will be *inaudible* at the nearest residential property line.

Further, as exterior walls and windows typically provide at least 25 dBA sound reduction from the outside to the inside, it is *highly unlikely* that any sound from the power inverters will be audible indoors. It is expected that the operation of the Solar One facility with sound control will not disturb the comfort and repose of any person in the vicinity.

Please contact me if you have any questions concerning these findings.

Very truly yours, BROOKS ACOUSTICS CORPORATION

Bennett M. Brooks, PE, FASA, INCE President

Attachments



Verogy Solar One Sound Study East Windsor, CT

### <u>Table 1</u>

#### **Sound Measurement Positions**

1 **Facility North Property Line** – Monitor installed on tripod, 5 ft 3 in above ground 48 feet N of facility fence at corner jog of the fence 10 ft S of east bound (EB) travel lane Middle Road N 41° 53' 33.16" W 72° 31' 10.33"

2

#### Nearest Residential Property Line

Monitor installed on tripod, 5 ft 3 in above ground
 82 feet N of facility fence at corner jog of the fence
 5 ft N of west bound (WB) travel lane Middle Road
 N 41° 53' 33.26" W 72° 31' 10.33"

Verogy Solar One Sound Study East Windsor, CT

## Table 2

## ACOUSTIC INSTRUMENTATION SYSTEMS

## 14 May 2022

## **Data Acquisition Equipment**

1. NTi Instruments	<ul> <li>Digital Precision Sound Level Analyzer - Class 1 Model NTi XL2, S/N A2A-100650-E0*</li> <li>Microphone - Model M2230, S/N 005503*</li> </ul>
2. Brüel and Kjær	- Acoustical Calibrator - Model 4230, S/N 1511181*
3. LG	- Phone Model LM-V600VM - GPS receiver

## Laboratory Playback and Analysis Equipment

- 1. Lenovo Computer workstation with USB & SD interfaces
- 2. Microsoft 365 Excel Spreadsheet Program
- 3. Brooks Acoustics BAC Proprietary Data Analysis Software

\*Note: Certificates of Calibration available upon request.



Figure 1. Site plan - Solar One East Windsor



Figure 2, a. Solar panels, power inverters, electric switchgear and transformers, and overhead transmission lines. Viewing west.



Figure 2, b. Solar power inverters. Viewing north.



Figure 2, c. Solar One Test Position 1. Facility North property line. Viewing northwest.



Figure 2, d. Solar One Test Position 1. Facility North property line. Viewing north toward nearest residence at 69 Middle Road.



Figure 2, e. Solar One Test Position 1. Facility North property line. Viewing east.



Figure 2, f. Solar One Test Position 1. Facility North property line. Viewing southeast.



Figure 2, g. Solar One Test Position 2. Nearest residential property line. Viewing south toward inverter bank.



Figure 2, h. Solar One Test Position 2. Nearest residential property line. Viewing east along Middle Road.



Figure 2, i. Solar One Test Position 2. Nearest residential property line. Viewing northeast.



Figure 2, j. Solar One Test Position 2. Nearest residential property line. Viewing west along Middle Road toward East Road.

	SF			ION CALCULA	TION
	Sou	ce: Inverters F	Receiver: Resi	idence Property	y Line
* Indicates v	alues to be	Input in feet sound fro Shelter 12 ft high & 12 B	om source up and ft deep - Inverters aseline elev. 205 f	over shelter roof to in middle of shelter ft	receiver behind shelter
h <sub>b</sub> := 12	*Height of b	arrier	$d_{sb} := -7$ *Distance from source to barrier		
$h_s := 5$	*Height of s	ource	$d_{hr} := 133$ *Distance from barrier to receiver		
$h_r := 5$	*Height of F	Receiver			
<u>c</u> := 344	Sp	eed of sound (m/s)	n := 0	08	
$\mathbf{f}_{\mathbf{n}} \coloneqq 31.25 \cdot 2^{\mathbf{n}}$	<sup>1</sup> Fro	equency of peak (Hz)			
$\lambda_n := \frac{c}{f_n}$	W	avelength of peak (met	ers)		
$D_{br} \coloneqq d_{br} \cdot .3048$	8	$D_{br} = 40.538$			
$D_{sb} := d_{sb} \cdot .3043$	8	$D_{sb} = -2.134$			
$H_{sb} := \left(h_b - h_s\right)$	)•.3048	$H_{sb} = 2.134$			
$\mathrm{H}_{br} := \left( \mathrm{h}_{b} - \mathrm{h}_{r} \right)$	)•.3048	$H_{br} = 2.134$	The path distances specific to the geometry of the installation in meters		
$\mathbf{R}_{sb} := \sqrt{\left(\mathbf{D}_{sb}\right)}$	$\left( H_{sb} \right)^2 + \left( H_{sb} \right)^2$	$R_{sb} = 3.01$	7		
$R_{br} := \sqrt{D_{br}^2}$	$+ H_{br}^{2}$	$R_{br} = 40.5$	95		
2·[(R <sub>sb</sub>	$(1 + R_{br}) - (I$	$D_{sb} + D_{br}$	Fresnel Nu	umber	
<u>Nn</u> := <u></u>	$\lambda_n$	<u> </u>			
<u>,</u> C_:= 10			C=10 for re (close to g	eceiver over reflectir round)	ng plane
A <sub>barrier</sub> <sub>n</sub> := 10	$\cdot \log \left[ 3 + C \cdot N \right]$	$J_{n} \cdot \exp\left[-\frac{1}{2000} \cdot \sqrt{\frac{1}{2 \cdot \left[\left(R\right)^{2}\right]}}\right]$	$\frac{R_{sb} \cdot R_{br} \cdot \left(D_{sb} + D_{b}\right)}{R_{sb} + R_{br} - \left(D_{sb} - D_{b}\right)}$	$\frac{\mathbf{r}}{\mathbf{r}}$	Barrier Attenuation
$A_{\text{barrier}} = \begin{pmatrix} 10.\\ 13.\\ 16.\\ 18.\\ 21.\\ 24.\\ 27.\\ 30.\\ 33. \end{pmatrix}$	.9 .4 .1 .9 .8 .8 .8 .8 .8 .8 .8	31.5 63 125 250 500 1000 2000 4000 8000	Note: Practical	l limit for barrier atte	nuation is 20 dB





Name: **2" Polysorb** Size Available: 5' x 9', 5'x 10' Thickness: 2 inch Core Density: 5.5 NRC: 0.95 Face Type: Ironed or unironed Core Color: Charcoal/Black Face, Charcoal, Heather, Light Grey, Cloud, White FSI: Class A Flame Spead Index

#### Description of the test specimen:

Name: PS2 Specimen Size: 24" x 48" x 2" Mount Method: Type A Mounting Method Frame Contruction: On the Floor

The shape of the reverberation chamber and its diffusion treatment are described in Annex D.

Area of test specimen: **10.80 m2** Air temp in the test room: **22 oC** Air humidity in test room: **63%**  Number of sound source positions: 2 Number of microphone positions per sound source position: 8 Type of noise used: Pink random noise. Type of mounting used: TypeA



#### Practical sound absorption coefficients

Hz	Хр
125	0.05
250	0.15
500	0.45
1000	0.75
2000	0.95
4000	0.95

Evaluation based on laboratory measurement results obtained by an engineering method.

Frequency f Hz	T 1 - Empty Chamber	Tc - With Sample	One-Third Octive
100	5.15	1.16	0.17
125	2.76	2.05	0.31
160	2.96	1.88	0.28
200	3.74	2.75	0.41
250	3.71	3.86	0.58
315	3.43	5.10	0.76
400	2.60	6.31	0.94
500	3.99	7.22	1.08
630	4.26	7.39	1.11
800	4.73	7.36	1.10
1000	5.03	7.40	1.11
1250	5.45	7.21	1.08
1600	6.17	6.94	1.04
2000	6.97	6.97	1.04
2500	7.75	6.27	0.94
3150	8.61	6.53	0.98
4000	10.25	6.97	1.04
5000	12.20	6.76	1.01

Ratings according to ISO 11654 Weighted sound absorption coefficient: 0.95 Sound absorption class: A

Rating according to ASTM C423 - 99 Noise Reduction Coefficient = 0.95 Sound Absorption Average = 0.93

It is strongly recommended to use this single number rating in combination with the complete sound absorption coefficient curve.



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1" thick panels come in multiple sheet sizes. - In stock



1/2" thick panels come in multiple sheet sizes. - In stock



3/8" thick panels come in multiple sheet sizes. - Available by special order



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