



February 8, 2013

Mr. Doug Anderson  
US Environmental Protection Agency (6202J)  
ENERGY STAR® Home Improvement Program Manager  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Ms. Emily Zachery  
D&R International, Ltd.  
1300 Spring Street, Suite 500  
Silver Spring, Maryland 20910

Dear Mr. Anderson and Ms. Zachery:

Pella Corporation appreciates the opportunity to review EPA's Draft 2 criteria proposal for Version 6.0 of the ENERGY STAR® Windows Program. We respectfully submit the following comments for your consideration:

- 1) **Additional trade-off options for windows in the North Zone.** Pella Corporation supports the two additional energy trade-off options. This will allow manufacturers to offer even more viable product options to the market-place.
- 2) **SHGC requirement for >1/2-lite doors.** Pella Corporation appreciates the changes made for >1/2-lite doors in the North and North Central zones. This will provide some relief in providing windows and doors with aesthetically compatible glazing options in those zones. However, due to the proposed two additional trade-off options for windows in the North Zone, there will still be a significant possibility of glazing color mismatches. To address this, we propose EPA establish an energy trade-off option for >1/2-lite doors in the North Zone whereby a U-factor of 0.32 may be allowed if the SHGC  $\geq$  0.40.
- 3) **Guidance on disposal or recycling of replaced products.** Pella appreciates the clarifications about management of lead paint in installation instructions. However we note that an additional requirement has been proposed for guidance on proper disposal or recycling of replaced products. Since this information can change frequently, we ask that EPA please clarify this new requirement:
  - a) State that installation instructions should direct users to [www.epa.gov/recycling](http://www.epa.gov/recycling).
  - b) Make the recycling statement a new paragraph to separate it from the statement regarding management of lead paint.
- 4) **Clarification to Paragraph 3.D.vii.** The current wording of this paragraph is somewhat confusing. It suggests that the exterior sheathing is not typically intact for new construction, which is not the case. Pella recommends revising this paragraph as follows:

Variations of the above, based on whether the job is a pocket [replacement](#), [full frame replacement](#), [or new construction](#) installation, ~~rough opening installation with exterior sheathing intact, and/or rough opening installation with exterior sheathing removed (e.g. new construction installation)~~, as applicable to the product.

Thank you for your time and consideration. We welcome the opportunity to review these points with you in more detail at your convenience.

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