



PeerlessBoilers.com

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June 4, 2010

Ms. Kathleen Vokes
US Environmental Protection Agency

Subject: Energy Star Products Enhanced Testing and Verification Program

Dear Ms. Vokes,

PB Heat has been participating in the EPA webinars on the subject of Energy Star program changes. We encourage the efforts of EPA to improve the process of submitting and maintaining Energy Star listings.

As a member of AHRI, we have been a participant in the AHRI boiler efficiency certification program. This program has a long standing acceptance in the industry that includes AHRI witnessed initial verification of new product efficiency and an annual verification of existing product efficiency. The program uses strict published procedures that are currently in process of obtaining ISO/IEC Guide 65, General Requirements for Operating Product Certification Systems through the Standards Council of Canada.

PB Heat believes the current AHRI procedural program must be accepted by EPA for qualification and follow-up verification of boiler efficiencies and that AHRI listed boilers that meet the Energy Star qualifications for efficiency should be accepted into the Energy Star program.

Additional regulatory efficiency testing outside of the AHRI program should not be required and would be an unnecessary burden on the manufacturers with no real improvement over the existing AHRI procedural program. Testing performed in AHRI accredited laboratories, including manufacturer laboratories, must continue to be recognized as approved facilities for performing efficiency testing. These test labs will be required to be inspected by an Independent Laboratory for equipment conformance to the requirements of 10CFR Part 430 and approved by AHRI. We believe this laboratory certification requirement should be a minimum laboratory requirement and that this is more than adequate for the purpose of determining boiler efficiency.

Regards,

Gary Sirois
Director of Engineering

Cc: AHRI (K. Amrane, M. Neufcort, F. Stanonik)