

Hoffmeyer, Darcy

From: Manny Muniz
Sent: Monday, February 10, 2003 4:54 PM
To: Hoffmeyer, Darcy
Subject: Comments on Draft 2 V3.0

Darcy Hoffmeyer
ICF Consulting

Thank you for the opportunity to comment on *Draft 2* Version 3.0 specifications for ENERGY STAR® qualified Exit Signs.

Comment #1

I wish to commend the EPA for their decision to remove criteria, which effectively precluded ENERGY STAR qualification of Photoluminescent and Radioluminescent (self-luminous) exit signs. This provides a fair and level playing field for the participation of all exit sign technologies in the ENERGY STAR program.

Comment #2

In the letter from Andrew Fanara dated January 14, 2003, paragraph four (4) states *"So that this process remains transparent and open to all who are interested, all comments will be posted on the ENERGY STAR Web site for review, unless the submitter requests that their comments remain confidential."*

Comments submitted and withheld from public review at the request of the submitter do not provide for a transparent and open process. Please know that I will continue to vigorously pursue this inequity until it is corrected.

Comment #3

Revise Item #1, Definitions, A. Exit Sign to read as follows:

"A sign complying with NFPA 101 Life Safety Code, 2000 Edition that is permanently fixed to identify the means of egress."

Rationale: NFPA 101, Life Safety Code defines "EXIT" in Chapter 3 as a portion of the means of egress. Other portions of the "means of egress" include the "exit access", the "exit discharge" and a "horizontal exit".

NFPA 101, Chapter 11 requires that the means of egress be marked with exit signs. Clarification, therefore, is needed to show that exit signs are used to identify the "Means of Egress" and not just exits.

Additionally, the exit sign should comply with all applicable NFPA 101 requirements, not just 7.10.4. The suggested definition above will accomplish this.

Comment #4

I wish to commend EPA for relying on the expertise of NFPA and UL in the development and adoption of minimum safety requirements and standards for exit signs. Building officials and fire officials from throughout the United States actively participate in the development of these regulations and standards and provide the very best consensus on fire and life safety.

Comment #5

I wish to commend EPA for conducting additional research to satisfy itself that it is not common practice at all to install an additional charging light source in order to result in 5 foot-candles on the face of a Photoluminescent exit sign. This has been my experience in observing the installation of these signs for many years.

Comment #6

3/19/2003

I suggest that the effective date be six (6) months from the time of publication of Version 3.0.

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