



August 31, 2017

Doug Anderson
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Brian Booher
D+R International
1100 Wayne Avenue, Suite 700
Silver Spring, Maryland 20910

RE: ENERGY STAR® for Exterior and Interior Storm Windows – Draft 1 Specification

AAMA has reviewed the Draft 1 Specification, and appreciates the opportunity to provide our comments regarding safety, energy efficiency, the Independent Verification Program (IVP), and the proposed ENERGY STAR label for storm windows as included in the draft specification.

NAFS - As stated in our previous public comments, AAMA still believes that storm windows should be in compliance with NAFS for both safety and energy efficiency reasons.

Safety – AAMA hopes that the EPA would agree that ENERGY STAR certified products must also meet basic safety requirements while still providing for energy efficiency. NAFS compliance ensures protection by requiring ASTM E1300 compliance, and pressure testing for glazing deflection and stress. The DOE’s previous Storm Window VPP Program required a minimum PG 15. Also, a requirement for NAFS compliance is consistent with the ENERGY STAR Guiding Principle relating to maintaining or enhancing overall product performance. We have to ask why the EPA now considers such compliance unimportant; since the need for safety has not changed.

Energy Efficiency - The purpose of ASTM E283 in NAFS is to ensure minimal air leakage performance is met to maintain energy efficiency. The draft specification requires testing according to AERC 1.2, specifying ASTM E283 with the addition of baffles. Using baffles in ASTM E283 results in a lower threshold for mass air leakage, thus reducing the baseline for energy efficiency in storm windows. This is another reason to require NAFS compliance.

During their August 3, 2017 webinar, the EPA stated that low-e storm windows, as do all products under ENERGY STAR programs, would be subject to the EPA’s Independent Verification Program (IVP). AAMA would like to see more details related to this requirement for low-e storm windows including the testing, certification and labeling of the emissivity, solar transmittance and air leakage as proposed to be required under this program.

The ENERGY STAR label format depicted in the draft closely resembles the label currently used for the Residential Windows, Doors, and Skylights category. AAMA believes using the same label format for two different product categories will cause confusion in the marketplace. Please

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consider using a different label format and shape for the storm window category. Perhaps a circular or oval label as opposed to the rectangular label used for windows and doors should be considered.

AAMA appreciates your continued approach to hear all the voices and concerns of industry and AAMA members. Should there be any questions or need for additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hanson", written in a cursive style.

Diana Hanson

Codes & Regulatory Affairs Manager

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