

February 5, 2016

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RE: ENERGY STAR[®] for Exterior and Interior Storm Panels

The American Architectural Manufacturers Association (AAMA) is a national trade association representing 275 corporate manufacturers and suppliers in the fenestration industry. Many AAMA representatives attended the Environmental Protection Agency's webinar regarding the potential new ENERGY STAR product specification for exterior and interior storm panels.

Based on the webinar and a review of the Exterior and Interior Storm Panels Framework document, AAMA developed the list of comments shown below.

AAMA's primary concern is consumer safety. The following items all relate to safety and AAMA is not aware of any significant building code oversight for storm panels like there is for windows and doors. In considering the installation of storm windows as an alternative to the installation of replacement windows, AAMA recommends that the EPA:

1. Require that installed ENERGY STAR certified storm panels do not inhibit egress functionality of opening dimensions and/or operability of windows;
2. Require that installed ENERGY STAR certified storm panels comply with code required hazardous location safety glazing provisions.
3. Require that ENERGY STAR certified storm panels be North American Fenestration Standard (NAFS) certified and labeled to ensure consistent, quality products, and to ensure proper glass strength in accordance with ASTM E1300.
4. Establish a maximum air leakage criteria that aligns with NAFS, for both interior and exterior panels. In addition, for exterior panels only, establish a minimum air leakage criteria. AAMA has strong concerns with the potential for condensation, mold and mildew, wood rot, heat buildup, building damage, and permanent glass stain affecting visibility, if maximum and minimum air leakage criteria are not established.

EPA should recognize that the use of storm panels will diminish daylight transmittance, which in most cases will cause increased artificial lighting use, and will affect energy savings. EPA should quantify this effect as part of their analysis, and consider additional metrics to account for this concern.

AAMA supports the EPA's proposal to require third party certification (i.e. NFRC or AERC) as a prerequisite for entry into the ENERGY STAR certification program. AAMA also urges the EPA to implement an aftermarket Independent Verification Program (IVP).

AAMA supports the proposed performance metrics as stated in III.b.i of the framework document (emissivity, solar transmittance and air leakage only). AAMA remains concerned that use of "U-factor" and "SHGC" by the storm panel industry may be confusing to consumers.

AAMA notes that the draft framework document indicates a price range for storm panels (including installation costs) similar to that of replacement windows. As such, AAMA requests the EPA provide information on storm panels alongside information on replacement windows to help consumers evaluate the best options for their needs.

Lastly, while AAMA acknowledges that installation of a storm panel will likely improve the energy efficiency of an existing window, the condition of the existing window must be taken into account. Specifically, installation of storm panels over fogged, leaking, inoperable or otherwise compromised windows diminishes the effectiveness of the storm panel addition. AAMA suggests that the EPA encourage consumers to obtain a window inspection prior to considering storm panel and replacement window options.

The EPA is encouraged to contact AAMA with any questions or concerns regarding these comments. AAMA looks forward to working with EPA to develop this program.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Walker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard Walker
President and CEO
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