



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

Climate Protection Partnerships Division
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Washington, DC 20460

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Dear ENERGY STAR for Storm Panels Stakeholder:

The U.S. Environmental Protection Agency (EPA) is pleased to announce the release of the comment response document for the ENERGY STAR Storm Panels Specification Framework Document. The document includes summaries of all comments submitted by stakeholders and EPA's response to each issue.

The comment response document is now available online at:
https://www.energystar.gov/products/spec/exterior_and_interior_storm_panels_version_1_0_pd

EPA thanks the many organizations and individuals that provided comments on the Framework Document. Based on the comments EPA received, the Agency believes it is appropriate to move forward and begin work to develop a criteria analysis report and a Draft 1 Specification for this product category.

With the help of stakeholders' input, EPA has identified several topics that require additional research and analysis. In the spirit of collaboration, EPA encourages stakeholders to provide data and/or feedback on the following issues in advance of EPA proposing a Draft 1 Specification:

Product Certification

EPA is aware that there may be several ways to certify the performance of storm panels and that the Attachments Energy Rating Council (AERC) is in the process of developing procedures for testing, rating, and certifying storm panel products. EPA believes that it is possible to proceed with specification development while AERC concurrently develops its procedures. However, EPA does not plan to propose a final specification before a third-party product certification procedure has been finalized.

Air Leakage

EPA is aware that additional research on an air leakage test procedure for storm panels is being conducted, but details of the revised test procedure have not been released. If a test procedure becomes available, EPA will reference it in a Draft 1 Specification. EPA invites stakeholders to provide additional input on test procedures for air leakage and reasonable benchmarks for air leakage criteria for storm panels.

Low Solar Transmittance

In the Framework Document, EPA proposed that storm panels be required to have low solar transmittance (Tsol) to be ENERGY STAR certified in the southern and south-central climate zones, based on energy savings analysis conducted by Pacific Northwest National

Laboratories (PNNL). A number of stakeholders raised issues for further consideration, including the following:

- The potential for overheating caused by using low-Tsol glass in interior storm panel applications.
- The availability of glass options with exposed surface low-emissivity coatings and low-Tsol on the market without the use of secondary films.
- The impact on visual transmittance when low-Tsol storm panels are used over primary windows that have low Solar Heat Gain Coefficient (SHGC) ratings.

EPA invites stakeholders to provide additional input on these issues.

Frame Performance

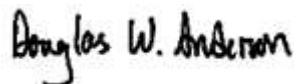
In the Framework Document, EPA proposed basing a specification on emissivity and solar transmittance, which are metrics for glass performance. A few stakeholders expressed support for EPA's position that, for the majority of storm panels on the market today, the frame does not have a significant impact on the energy performance of the product. EPA is interested in reviewing modeling data that supports or refutes that claim.

Stakeholders who wish to provide data and/or feedback on the above questions, or on any issues related to an ENERGY STAR specification for storm panels, should contact EPA at windows@energystar.gov.

EPA will use additional stakeholder input to inform a criteria analysis report and Draft 1 Specification proposal, which it expects to publish in late 2016 or early 2017. EPA does not plan to publish a formal comment response document on any additional feedback received prior to publication of the Draft 1 Specification, but any input submitted by stakeholders will be published for the record on the specification development web page. Stakeholders will have another opportunity to submit formal comments following the publication of the Draft 1 Specification.

Thank you for your continued interest in ENERGY STAR.

Sincerely,



Douglas W. Anderson
ENERGY STAR Project Manager
U.S. Environmental Protection Agency