



August 31, 2017

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

Dear Doug:

Larson Manufacturing Company appreciates the ongoing efforts of the Environmental Protection Agency to investigate an Energy Star program for storm windows, along with the opportunity to respond to the proposed Energy Star Program Requirements for Exterior and Interior Storm Windows Draft 1 Version 1.0 and accompanying Criteria Analysis Report released on July 21. Larson offers the following comments:

I. Definitions

Solar Heat Gain Coefficient (SHGC): Larson believes “due” can be removed from this definition so it reads “The ratio of solar radiation that passes through a fenestration system to incident solar radiation”.

Air Leakage: Larson suggests removing “to the incident solar radiation” such that the definition reads “The volume of air flowing per unit time per unit area (cfm/ft²) through a fenestration system”.

II. Energy Efficiency Requirements

Solar Transmission for North-Central Climate Zone: It is respectfully offered that “any” may be a simpler alternative to “ ≤ 0.55 or > 0.55 ”.

III. Air Leakage Test Requirements:

Larson supports the use of ASTM E283 in accordance with AERC 1.2 as the test method for establishing the air leakage for storm windows. ASTM E283 is widely used in the determination of air leakage of fenestration products, and the addition of the method prescribed in AERC 1.2 provides the most realistic measure of the overall air leakage of the fenestration system after the storm window has been installed.

IV. Certification Requirements:

Larson supports the direction to limit the requirements for certification to criteria related only to energy performance. While product safety is extremely important to Larson, the inclusion of additional requirements for product performance such as compliance with NAFS or ASTM E1300 would unnecessarily increase the cost of storm windows to homeowners and building owners without increasing the effectiveness of the program.

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With respect to the guiding principle related to maintaining or enhancing product performance while increasing energy efficiency, Larson believes the EPA has correctly concluded that the proposed specifications (emissivity, solar transmittance, and air leakage) will differentiate the most energy efficient storm windows from other products within the product category without impacting other product performance factors, including product safety.

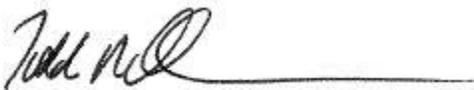
Finally, Larson appreciates the approach the EPA has demonstrated in communicating its willingness to consider alternative procedures and criteria for Energy Star certification of storm windows. Larson fully supports the requirements proposed in the Draft 1 specification and believes these are appropriate, effective, simple, and will enable an Energy Star program to be successfully launched. Ongoing efforts within the fenestration attachments industry including the Attachments Energy Rating Council (AERC) rating and certification program may lead to additional, equivalent performance metrics and criteria that can be incorporated into an Energy Star specification for storm windows in the future.

V. Consumer Checklist:

Related to the consideration of the condition of the current windows, Larson suggests that the phrase “If your windows are rotted, damaged, or broken...” may unintentionally steer people away from storm windows due issues as easy to resolve as a piece of broken glass or crumbling glazing compound. A suggested alternative is “If your windows are rotted or unrepairable...”.

Larson Manufacturing Company continues to support the EPA’s efforts to develop an Energy Star program for storm windows. Storm windows provide an effective and reasonably-priced solution for homeowners and building owners desiring to improve the energy efficiency and comfort of their windows. An Energy Star program for exterior and interior storm windows will assist such decision-makers in selecting the most efficient products by creating an independent, credible, and highly recognizable program for this product category. Should you have any questions or wish for clarification on anything, please do not hesitate to contact me. Thank you.

Regards,



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