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EPA Draft 1 Version 6.0 Criteria and Analysis Stakeholders Meeting

Recommendations submitted by

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August 27, 2012

Door and Skylight issues

1. Door: "29.8 percent glazing" confusing

2. Door: Inconsistency between full lite and half lite U-factors

3. Skylight: TDD listed and recent test results need considered to finalize ES U-factor

1. "29.8 percent glazing" = ½ lite

Conflicts with industry ratings

- Per NFRC 100-2010, page 40
  - ½ lite = 560mm x 915mm (22X36)
  - Full lite = 560mm x 1625mm (22X64)

Percentage not used in industry

Confusing to industry and consumer

1. "29.8 percent glazing" = ½ lite (continued)

Recommend:

- "29.8 percent glazing" be eliminated
- Maintain current NFRC rating sizes

  ½ lite = 560mm x 915mm (22X36)

  Full lite = 560mm x 1625mm (22X64)

2. Full lite and 1/2 lite inconsistent

Consistency expectation

If an IG construction in a specific door meets ES in a full lite . . .

. . . a ½ lite of the same IG construction in the same door should also meet ES

2. Full lite and 1/2 lite inconsistent (continued)

Many examples in the NFRC's CPD, i.e.,

0.17 Opaque door – meets ES
0.30 Full lite IG with hard coat low e – meets ES
0.25 ½ lite, same IG construction – does not meet ES
Note: soft coat & argon required for ½ lite to achieve 0.23

Recommendation:
0.17 opaque, 0.30 full lite, 0.25 half lite

Note: same issue occurred last time ES revised - when understood . . . 0.32 kept for full lite, ½ lite changed to 0.27

3. TDD U-factor Testing

Reference Figure 26 on Page 43

- Based on CPD . . . nearly all averages and medians below 0.40

Recent changes

- U-factor simulations replaced by physical testing
- Physical test results vary since test equipment began use
- Recent tests demonstrate these low values not repeatable or achievable with same designs

3. TDD U-factor Testing
(continued)

Recommend:

- Prepare to revise 0.45 U-factor proposal
- Revise ES requirement based on results communicated during Comment Period 3