

Vent Fan Version 4.0 Spec - Stakeholder Comments on Interim Proposal

Topic	Comment	Draft Comment Response
General		
General	Two stakeholders recommended that an internet based ducting installation guide be developed by HVI to use as a reference in the instruction sheets.	EPA agrees that an internet based ducting guide could be a useful tool, and may develop it for energystar.gov.
Installation Instructions		
Short straight ducts are needed to achieve the desired airflow	Two stakeholders commented that short straight ducts are recommended, but not needed, to achieve acceptable performance. One stakeholder suggested changing the word "needed" to "recommended". Another stakeholder preferred to change the statement to say "Never reduce the duct size below the size provided by the manufacturer".	EPA agrees that these changes would increase the clarity of the text and has included them.
General	A stakeholder asked for clarification on what meets the definition of "picture diagram-type installation instructions" and if there a required number of picture diagrams.	This has not been a point of confusion in the past. If further confusion arises, EPA will address it at the time.
	A stakeholder commented that the consumer who is purchasing a new bath fan to replace an existing unit would not replace or modify the existing ducting due to cost and/or access. And, that their research showed that simplicity and speed of the retrofit are key drivers for consumers. In addition, an increase in ducting size, which may be beneficial, may be restricted by the termination device on the exterior of the structure. Secondly, that the contractor on a new installation rarely reads the included installation manuals as they use past experiences and local codes as their paradigm to a "proper" installation.	EPA's discussions with stakeholders before and after the release of the interim proposal for vent fans confirmed that there is considerable opportunity to improve installation, but further discussion will be needed to settle on the easiest and most effective way to address it. EPA looks forward to continuing discussions with stakeholders about opportunities for change. In the meantime, for the purposes of this version, EPA has settled on relatively simple requirements, which incorporate several suggestions in these comments.
Sealing the Fan	A stakeholder suggested developing a form that all manufacturers could use for the duct work portion as this applies the same way to all products. Another stakeholder supported the concept of the language, adding that manufacturers should be given the option of either text or pictorial to convey the principle of sealing.	
Vibration deadening materials	A stakeholder commented that manufacturers of quiet fans should be able to state that no vibration deadening materials are necessary.	
	Three stakeholders commented that rigid ducting is much more efficient at reducing static pressure as reflected in the longer allowable duct runs in ASHRAE 62.2 -2013. Flex duct causes greater static pressures causing in many fans the motor to speed up and increase sound.	
Minimize building heat loss/condensation	One stakeholder agreed in principle but recommended that manufacturers should be given the option of either text or pictorial to convey the principle. Another stakeholder commented that they would like to see identical language that all manufacturers include, something like "if your ductwork runs through a space that will be less than 50 degrees or some agreeable number, it is recommended that..."	

	One stakeholder commented that insulation should not be installed around the fan of a range hood.	
Short straight ducts are needed to achieve the desired airflow	Two stakeholders commented that shorter and straighter duct runs holds true for all ventilation devices. It is more critical in the higher CFM and smaller ducting of bath fans.	
Duct Length Table	Three stakeholders recommended re-examining the duct lengths used in Table 3. ASHRAE 62.2 Table 5.3 provides maximum duct length for rated airflows at 0.25" in. w.c. Listing the maximum recommended duct lengths for rated airflow performance at 0.25" would allow the better performing fans the option of longer ducting, and would simplify the table. Also, it was recommended to continue to allow 4" duct diameter at 100 CFM and 6" duct diameter at 250 CFM. Stakeholders also asked that if smooth duct and range hoods and inline fans were omitted purposely from the table, EPA should address the reason for the omission. Rigid ducting is a preferred and a more efficient ducting method. Stakeholders also commented that adding a table to the existing instruction sheets may be costly.	
In-Line Fan (Additional) Installation Instructions		
General	One stakeholder commented that this recommendation is applicable to high speed Inline fans using 2 pole motors that need to be far away to be quiet. As this is not the only style of Inline Fan that are available, fans that are quiet by design should not be double burdened by these requirements.	
Definitions	One stakeholder asked for a better description of a 'metal sound attenuator'.	
Lighting		
General	One stakeholder commented that there is no need for the requirement "ENERGY STAR lamps used in ventilating fans shall be safety rated for damp locations and if appropriate for enclosed fixtures or recessed fixtures." as products certified by HVI requires listing to UL507 (which includes a water spray test) safety standard.	EPA has investigated the UL 507 test and agrees. This requirement has been removed.
	Regarding the section A (2) under Lighting Requirements, one stakeholder asked for clarification on the last sentence " <i>For bathroom and utility ventilating fans, lamps shall have efficacy of 65 lumens/W or greater, and the fixture shall comply with thermal management requirements appropriate to the light source type as specified in the ENERGY STAR® Program Requirements, Product Specification for Luminaires - Eligibility Criteria in effect at the time the product is manufactured</i> " as it appears that the option (2) will be governed by two separate specifications. Another stakeholder asked for clarification on whether or not the ventilating fan lighting is exempt from the Packaging Requirements in the Lamps specification.	Upon further consideration of the interaction of lamp and fixture requirements, EPA has concluded that temperature testing fixtures for products shipping with ENERGY STAR certified lamps is not necessary, and it has been removed.