



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

OFFICE OF
AIR AND RADIATION

July 25, 2013

Dear ENERGY STAR® Boiler Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 2 Version 3.0 ENERGY STAR® Boiler specification. Stakeholders are encouraged to submit comments on this Draft to EPA no later than August 30, 2013.

The Draft 2 specification was developed based on comments received on the Draft 1 specification as well as subsequent stakeholder discussions and research. Significant feedback was received in two areas, as discussed below.

Condensing Unit Life Expectancy and Payback.

Some stakeholders asserted that condensing boilers have shorter life expectancy, negatively impacting consumer payback by requiring the additional expense of more frequent replacements. Through numerous discussions with manufacturers and technical experts, EPA thoroughly explored this concern. In the absence of data showing otherwise, EPA continues to believe that if condensing boilers are properly installed and maintained, the life expectancy should be similar to non-condensing boilers and thus has maintained the ENERGY STAR level for gas boilers at the condensing performance level.

Annual Fuel Utilization Efficiency (AFUE) Calculation

Stakeholders that support EPA's intention to recognize boiler performance at the condensing level asked the Agency to revisit the 90% AFUE proposal once DOE finalized the AFUE calculation for condensing boilers. EPA is aware that DOE has finalized the calculation for two stage and modulating condensing boilers. Manufacturers that find that the revised calculation results in AFUE below 90 for condensing products are encouraged to inform EPA.

EPA addresses these and additional stakeholder comments on Draft 1 in note boxes found throughout the Draft 2 specification.

Comment Submittal

Stakeholders are encouraged to provide written comments for EPA consideration to Boilers@energystar.gov by **August 30, 2013**. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

ENERGY STAR Stakeholder Webinar

EPA will host a stakeholder webinar to discuss the Draft 2 proposal on **August 20, 2013 from 1:00 pm to 3:00 pm, Eastern Time**. Stakeholders interested in participating in this discussion should RSVP to Boilers@energystar.gov by **August 16, 2013**.

To track EPA's progress in developing the ENERGY STAR Boilers specification, visit the Product Development website at www.energystar.gov/revisedspecs ([click on Version 1.0 development link](#)).

Please direct any specific questions to Abigail Daken at EPA, daken.abigail@epa.gov or 202-343-9375 or Sarah Medepalli, ICF International, at sarah.medepalli@icfi.com or 202-677-5201. Please direct specific questions regarding test methods to Ashley Armstrong at DOE, Ashley.armstrong@ee.doe.gov or 202-586-6590. Thank you for taking the time to review this draft specification.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Abigail Daken', written in dark ink.

Abigail Daken, Product Manager
ENERGY STAR for HVAC