



AIR MOVEMENT AND CONTROL ASSOCIATION INTERNATIONAL, INC.

**International Headquarters
30 West University Drive
Arlington Heights, IL 60004-1893**

TO: expartecommunications@hq.doe.gov (sent via email)

CC: Ashley.Armstrong@ee.doe.gov

FROM: Mark Stevens, Executive Director of AMCA International

DATE: November 9, 2015

RE: Memorandum Memorializing Ex Parte Communication, November 9, 2015 related to DOE impending coverage for commercial and industrial fans, blowers, and fume hoods, Docket No. EERE---2011---BT---DET---0045.

Meeting Purpose: The meeting was requested by AMCA International to inform DOE and inquire regarding subjects that were covered during the ASRAC sponsored negotiation, but not clearly resolved.

Representing the U.S. Department of Energy:

- John Cymbalsky, Appliance Standards, Building Technologies Program
- Ashley Armstrong, Appliance Standards, Building Technologies Program

Representing AMCA International:

- Mark Bublitz, New York Blower Company, AMCA Committee chair
- Geoff Sheard, AGS Consulting, Retired Board Chair
- Mike Wolf, Greenheck Fan
- Trinity Persful, Twin City Fan Company
- Mark Stevens, AMCA Executive Director
- Wade Smith, Consultant to AMCA International, Inc.
- Tom Catania, Consultant to AMCA

Discussion Notes

1. Target efficiency and non-compliance rates supporting the recommendation made by AMCA and Efficiency Advocates during the ASRAC negotiation was discussed.
2. VFD credit to FEP (to offset VFD losses) recommendation made during the ASRAC working group was discussed.
3. VFD credit to FEI. AMCA recommended during the ASRAC working group meetings that the FEI rating of a fan be increased by 2x when controls vary the speed of the fan during operation.

4. ECAT (Electronic Catalog Checking System) is used by AMCA to check validity of product selection programs. AMCA suggested that DOE use ECAT or a comparable system to evaluate selection software which represents what manufacturers offer for sale.
5. Procedure and process was discussed that would ultimately allow AMCA to submit DOE certification on behalf of its members' certified fans, as AHRI does for its members today.
6. Air Handler Fan Array – this discussion dealt with need to base FEP standard on array total flow, since the array competes with a single fan and should be considered against the same standard.
7. Discussion covered exemptions voted in as part of the ASRAC consensus which are somewhat ambiguous in terms sheet.
 - i. Nuclear – the working group agreed to exempt nuclear fans
 - ii. Transport – fans used in all transportation equipment that are not normally grid connected should be exempt
 - iii. Air Curtains – defined as a fan with a discharge aspect ratio greater than 5:1
 - iv. Military Equipment – DOD does not allow manufacturers to reveal information
8. Discussion covered Loopholes created in current terms sheet that the working group did not intend
 - i. “Packaged air cooled dry coolers”
 - ii. 200 F should be 200 C. AMCA believes this is a terms sheet error. At 200F, most fan designs are not altered.
9. Average speed for test – “Speeds offered for sale” are not known at time of the rating test, so neither is the average speed. AMCA will make a recommendation in a public comment that describes a change in language which does not change the intent, allowing use of the fan laws to determine performance at average speed in initial test report provided with certification.
10. # of points tested – AMCA recommends use of AMCA 210 minimum of 8 test points from wide open to block tight airflow.
11. AMCA inquired and DOE affirmed that manufacturer certifications must be backed by a lab test report. AMCA asked what lab requirements would be established by DOE.
12. AMCA asked for an update to questions on which there was not a consensus, but DOE did not respond, referring AMCA to the NOPR once published.
13. AMCA informed DOE regarding changes to AMCA Certified Ratings Program that are under consideration which are intended to reduce risk of DOE check test failure to near “0” for AMCA certified products.

Surveillance – AMCA asked and DOE was able to clarify surveillance and enforcement procurement, payment for the test fan, actions would trigger a test, and the importance of labeling to aid in surveillance and enforcement.

14. AMCA inquired as to how manufacturers would certify partial width wheels, or other custom modification to higher volume production fans. DOE explained options that will be available.