

DOCKETED

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*Comment Received From: Byron Horak - Intertek
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Intertek's Comments to the public comments submitted by Home Ventilating Institute (HVI)

Additional submitted attachment is included below.

January 30, 2020

Mr. Peter Strait, Supervisor, Building Standards Office
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

via Email: peter.strait@energy.ca.gov

RE: Docket No. 19-BSTD-10, Application for Approval of AHAM Product Directory for use in place of HVI Directory for Kitchen Range Hoods

Dear Mr. Strait,

This letter is in response to the public comments submitted by Home Ventilating Institute (HVI) in the enclosed letter dated January 9, 2020 regarding CEC's acceptance of the AHAM application for a Residential Kitchen Range Hood Certification Program.



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As a Nationally Recognized Testing Laboratory (NRTL) Intertek is recognized and approved for various accreditations, such as:

- IAS (attached in AHAM's amended application)
 - ENERGY STAR for Residential Ventilating Fans
 - Airflow Rating – ANSI/AMCA 210-16 Laboratory Methods of Testing Fans for Aerodynamic Performance Rating).
 - Sound Rating - ANSI/AMCA Standard 300-14 Reverberant Room Method for Sound Testing of Fans and AMCA Publication 311-16 Certified Ratings Program – Product Rating Manual for Fan Sound Performance (spherical sones method only)

In December of 2019, Intertek received an email from HVI inquiring as to our technical capabilities to test to HVI Publication 915 for sound and HVI Publication 916 for airflow. At that time, Intertek felt becoming accepted by HVI would be a conflict of interest because Intertek had already committed to AHAM to become its program laboratory for the AHAM Kitchen Range Hood Certification Program. This was an internal discussion and decision made by Intertek. AHAM was not aware of the request by HVI.

In the HVI letter it is stated that the Intertek background noise is too loud. Intertek has demonstrated to AHAM that we have the ability to measure sones down to 0.3 sones with no background contamination with a rotating microphone boom. This data is available upon request.





Further in their letter they cite HVI's round robin testing and states that Intertek had noticeably different results for airflow. This testing was performed approximately 8 years ago on a different flow stand. Based on our current airflow capabilities and recent testing comparison testing done for AHAM, the results were within acceptable tolerances. CEC has already received this data from AHAM.

HVI's assertion that Intertek is not in compliance with Title 24 and ASHRAE 62.2 requirements is patently incorrect. ASHRAE 62.2 Section 7.1 states units shall be **tested** in accordance with ANSI/ASHRAE 51 / AMCA 210 and ANSI/AMCA 300. ASHRAE 62.2 Section 7.1 states the units shall be **rated** in accordance with HVI 915, HVI 916, and HVI 920. Intertek **meets the requirements** of ASHRAE 62.2 Section 7.1 through the following:

- Intertek performs testing in accordance with AMCA 210 and presents test data per this Method Of Test (MOT).
 - Airflow - CFM will be reported without correction to SCFM as listed in HVI 916.
 - Test setups follow HVI 916 setup diagram 2 or 5 (depending on the location of the range hood exhaust).
- Intertek uses a precision reverberation room test method to AMCA 300.
- Specifically, for Rating in accordance to HVI Standard:
 - Sound - Intertek will follow the Sones calculation from HVI 915. All other test information Intertek provides will follow AMCA 300.

Additionally, Intertek is an approved lab for CEC title 20 testing for airflow which follows HVI 916. This approval does not extend to acceptance by HVI, nor is Intertek seeking acceptance nor approval by HVI.

Finally, Intertek has a long-standing relationship with the CEC and has worked very closely with CEC staff for product submittals. Based on our accreditations and decades as an Acoustical testing laboratory with long term employees, our well-established relationship with AHAM and its members, and with the CEC, Intertek meets all of the requirements as an approved testing laboratory for AHAM's Residential Kitchen Range Hood Certification Program.

Warm regards,

Byron F. Horak
Director of Programs and Engineering, HVAC Performance
Email: Byron.horak@intertek.com