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Comment Received From: M. K. Plastics Corporation

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M. K. Plastics Corporation Comments On Staff Supplement Variable Exhaust Flow Control

Additional submitted attachment is included below.

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March 5, 2018

Mr. Mark Alatorre, PE
Building Standards Development
California Energy Commission
1516 Ninth Street, MS37
Sacramento, CA 95814

RE: Docket Number 17-BSTD-02; Staff Supplement Variable Exhaust Flow Control (TN#-222281)

These comments are submitted by the M.K. Plastics Corporation in response to the Staff Supplement to CASE Report #2019-NR-MECH3-F by RJ Wichert submitted to the Subject Docket on January 19, 2018.

M.K. Plastics strongly encourages the CEC to reconsider the Staff decision to remove the requirement in Section 140.9(c)1B for “The exhaust fan system, including fan, nozzle, stack and wind band shall be licensed to bear the AMCA (Certified) ratings seal for air performance (AMCA 210) or AMCA ratings seal for induced flow fan high plume dilution blowers (AMCA 260).”

AMCA International definition of an induced flow fan states that “An inducted (sic) flow fan is a housed fan whose outlet airflow is greater than its inlet airflow due to induced airflow.” And, such a fan “will include a nozzle and windband.” The reference performance test standard is “ANSI/AMCA Standard 260-13 Laboratory Methods of Testing Induced Flow Fans for Rating”. For a product to be Licensed to Bear the AMCA Certified Ratings Seal for Induced Flow Fan Air and Sound Performance, the fan shall have been tested in accordance with AMCA Standard 260 (and AMCA Standard 300 for sound performance) in an AMCA accredited test facility, and the fan’s air and sound performance ratings must be published in a catalog (which may be a selection program) available to the public, which has been checked by AMCA verifying the accuracy of the published performance data. This Certified Ratings Seal gives the system designer/specifier and user the confidence that the fan will perform as rated.

Most of the induced flow fans on the market today bear this AMCA Certified Ratings Seal. It’s already there in the marketplace, and thus requires no incremental additional cost. Market availability of AMCA Certified induced flow fans may be easily confirmed by doing certified product search at www.amca.org, or by contacting AMCA staff at +1 847 394-0150.

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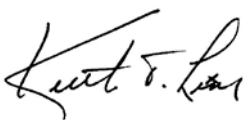
But, the key issue is safety. Induced flow fans are used in critical exhaust systems to maintain the life safety of people in and around the building. And this relates to how the fan performs both on the suction or inlet side, and the discharge side. The performance ratings for both must be accurate to ensure the safety and integrity of the system design.

The performance of the fan on the inlet side, which ensures proper flow and pressure development will typically be verified by testing in the field as the system (building) is started and commissioned. But the fan discharge side performance, which ensures the proper dilution and “throw” of the exhaust effluent is rarely tested in the field, and no standardized method for such field testing is presently in place. Hence, the safety and integrity of both the basic exhaust system design, and any wind dispersion modeling and analysis, rests squarely on the accuracy of the fan manufacturer’s published performance.

Established in 1963, M.K. Plastics is a leading designer, manufacturer, and marketer of corrosion resistant air movement and control products for critical service environments.

I have over forty years experience in the HVAC industry, as a senior executive with two major manufacturers of fans for severe duty and critical service applications. I have managed the design of fans and blowers, and have participated in and chaired several working committees for AMCA International. Among others, I am an original member of the AMCA 260 Committee and a continuing member of the AMCA 260 Review Committee. And I am also an active ASHRAE member.

Respectively submitted,



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