

**From:** [Baker, James](#)  
**To:** [ENERGYSTARVerificationProgram@energystar.gov](mailto:ENERGYSTARVerificationProgram@energystar.gov);  
**cc:** [Hitchcock, Reed](#); [Steve Ryan](#); [monahan.eamon@epa.gov](mailto:monahan.eamon@epa.gov);  
**Subject:** Draft Certification and Verification Requirements  
**Date:** Wednesday, June 23, 2010 8:07:11 PM

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Re: ENERGYSTARVerificationProgram@energystar.gov

Via: email

Dear Sir or Madame;

The Asphalt Roofing Manufacturers Association (ARMA) is the North American trade association representing the manufacturers and suppliers of bituminous-based residential and commercial fiberglass and organic asphalt shingle roofing products, roll roofing, built-up (BUR) roofing systems, and modified bitumen roofing systems.

Overall, ARMA finds it difficult to provide a complete review and to comment on the “Conditions and Criteria for Recognition of Certification Bodies for the Energy Star Program” without knowing how these criteria will be applied to roofing industry-specific segment. Can you provide guidance as to when a draft version of the roofing program specifics will be available?

In the meantime, we have several comments/suggestions/issues with specific items found within the Certification Bodies document. Each item is listed below with the text from the document shown first and then ARMA’s comment directly following it:

*1) **General Requirements and Responsibilities**; (g) Ensure each manufacturing facility has adequate controls in place to maintain manufacturing consistency and consistent product performance with respect to the relevant ENERGY STAR program requirements; and ensure the criteria for the assessment of such controls are documented.*

>ARMA questions the need for the ENERGY STAR program to determine an adequate level of control mechanisms for manufacturers

in the manufacturing of products. ARMA believes the requirements in “Section 3.) ENERGY STAR Verification a) Verification Testing; b) Product Specification Audit; and c) Challenge Testing” eliminate the need for this redundant and expensive requirement as the testing and auditing will effectively ensure compliance with the ENERGY STAR program requirements.

*3) a) i) (2) Number of products (a) Test at least 10% of all ENERGY STAR qualified base models per year.*

>The actual percentage of models to be tested should vary appropriately by product specific program and should not be defined within this “broadly scoped” document. Additionally, if there are multiple CBs for an ENERGY STAR specific program, then a specific CB should only test those products that it certifies and lists.

*3 Verification Testing b) Product Specification Audit i) Have procedures to re-evaluate product performance in the event of changes significantly<sup>3</sup> affecting the product’s design or specification, or as relevant, changes in the accreditation of the laboratory that performed the test(s) used for the purpose of certifying the product, or in the case of any other information indicating that the product may no longer meet ENERGY STAR program requirements. Consistent with this, the CB shall: (1) Maintain product design specifications for the products it certifies, and conduct random inspections at the manufacturing location to ensure conformity to original product design specifications.*

>ARMA believes that maintenance of product design specifications shall be limited to those design specifications that affect the ENERGY STAR qualification. Additionally, those design specifications and formulations MUST be held as CONFIDENTIAL BUSINESS INFORMATION.

ARMA believes ENERGY STAR and its CB should not be concerned with individual manufacturing processes; collection of complete design specifications; nor engage in the inspection of manufacturing facilities as this is outside the scope of its authority to rate a product. For an example, note that variations in the process by which paint is

applied to the exterior of a refrigerator (or the type of paint used) do not affect the ability to achieve ENERGY STAR energy efficiency qualification and, therefore, should be of no concern to ENERGY STAR and/or its CB.

*d) Resolving Discrepancies: Have in place a procedure to resolve discrepancies between data resulting from product re-testing (for any purpose, for example, verification or challenge testing), and the data previously certified by the CB. In the case of a discrepancy, the CB shall report to EPA the test results, both initial and final in case additional re-testing is performed, that are relevant to ENERGY STAR qualification.<sup>4</sup> The CB shall also notify EPA of the resolution of product re-testing, for example, decertification or recertification.*

>ARMA observed that terms “discrepancy” and “failure” are referenced through out the “Conditions and Criteria for Recognition of Certification Bodies for the Energy Star Program;” however, what constitutes a discrepancy or failure is neither defined nor quantified.

>ARMA recommends that ENERGY STAR separately define the terms “discrepancy” and “failure” in the requirements for each product-specific category.

Finally, ARMA would like to thank ENERGY STAR for this opportunity to comment on the Verification Program Criteria and **ARMA requests a meeting the appropriate ENERGY STAR staff liaisons regarding the development of “Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Roofing Program.”**

ARMA Members would suggest the morning of July 7, 2010 or July 9, 2010.

Should you have any questions regarding our comments and/or to coordinate a time for a face-to-face meeting with the staff drafting the CB Requirements for the ENERGY STAR Roofing Program, please call me at 202-207-1114 or email [jbaker@kellencompany.com](mailto:jbaker@kellencompany.com).

Thank you,

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