

August 16, 2006

Mr. Steven J. Ryan
U.S. EPA OFFICE OF AIR AND RADIATION
ENERGY STAR for Roof Products
Washington, D.C. 20460

Dear Mr. Ryan:

The Cool Metal Roofing Coalition wishes to compliment EPA on its Final Draft ENERGY STAR specification (Version 2.0) for roof products with its significant improvements.

We must advise of one critical shortcoming in the Final Draft. Many Galvalume® coated sheet steel roofing products are listed in the Energy Star Roof Products Directory for their high reflectance but the proposed thermal emittance specification may remove them. The Solar Reflective Index (SRI) is an alternative method for thermal emittance below 0.75. As drafted, the steep slope SRI value requirements are satisfactory, but the low slope SRI values are too high at initial ≥ 75 and aged ≥ 53 . If adopted, these values would clearly remove Galvalume, a strong, energy-saving performer, from the Directory and ultimately from the marketplace.

	TSR(i)	TSR(a)	TE		SRI(i)	SRI(a)
Mill passivated Galvalume	0.78	0.58	0.08	yields	75	34
Acrylic coated Galvalume	0.68	0.55	0.08	yields	55	28

As shown above, both unpainted Galvalume products meet the Energy Star TSR performance values of 0.65 (initial) and 0.50 (aged). Neither meets the thermal emittance value of 0.75. One does meet the proposed initial SRI value of ≥ 75 , but both fail the aged SRI value of ≥ 53 . We therefore urgently recommend that the SRI equivalents be appropriately revised to the following: initial ≥ 55 and aged ≥ 28 .

The energy-saving benefits of Galvalume coated sheet steel roofing are well recognized and it should be kept in service as an Energy Star Roof Product. In addition, this roofing contains significant recycled content, is durable for a very long, credible service life, and is recyclable at end of life. We request to meet with you to discuss this critical matter in more detail.

Sincerely,



Gregory L. Crawford
Executive Director

The Cool Metal Roofing Coalition educates architects, owners, specifiers, and standards officials about the sustainable, energy-related benefits of metal roofing and siding. Sustaining Members include the American Iron and Steel Institute, Galvalume® Sheet Producers of North America, Metal Building Manufacturers Association, Metal Construction Association and National Coil Coating Association. Affiliate Members are the American Zinc Association and Oak Ridge National Laboratory.