

Hello,

I am the Marketing Director for Valspar's Coil Coatings Division. I would like to provide the following input regarding ENERGY STAR proposed changes.

Consideration of Climate Zones

Currently in Version 2.2, samples requiring testing in accordance with ASTM G 7 do not specify a specific climate zone. With Version 3.0 Draft, the EPA is now considering a requirement for multiple climate zones. Today, weathering tests in the United States are commonly carried out in South Florida or Arizona. Many of the products that have been submitted to Energy Star would likely have been weathered in one of these geographic locations. Therefore, the weathering requirement should be **either** South Florida or Arizona, **not both**, provided the exposure site is a commercial or private weathering farm that is accredited to ISO 17025:2005 – General Requirements for the Competence of Testing and Calibration Laboratories.

In these difficult economic times, a decision requiring multiple weathering locations will have a major financial burden to customer and would be especially difficult for smaller Energy Star partners.

Verifying Ongoing Product Qualification

I would like to see Energy Star provide better direction to the certification body as to what this specific testing would entail. Currently there is a significant difference between certification bodies with regard to what testing is done, and what constitutes a pass or failure.

Regards,

Bill Simser | Valspar
Marketing Director - Coil
Office: 612-851-7636
Cell: 612-239-8302
Email: bsimser@valspar.com