

Sika Sarnafil

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July 23, 2012

Sent by e-mail to: Ryan.Steven@epa.gov

United States Environmental Protection Agency
Washington, D.C. 20460

Attention: S. Ryan, ENERGY STAR Roof Products Program Manager

Re:
ENERGY STAR Draft 2 Version 3.0 Roof Products Specification
ENERGY STAR Test Method for Roof Products: Maintenance of Solar Reflectance

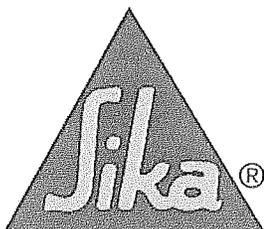
Dear Mr. Ryan

Thank you for providing us with the opportunity to comment on the latest drafts of the above captioned documents.

For the most part we are agreeable to the changes being proposed to the program. We do however have a concern with the proposal to require aged reflectivity measurements to be based on weathering at a single weathering farm located in a hot/humid climate. In your cover letter summarizing the changes to these documents, you imply that doing so will result in aged reflectivity data that is more "representative of true performance".

As you are aware reflectivity retention over time depends on a number of factors including roof slope, a building's location (e.g. rural versus urban, the presence of manufacturing or other industrial operations adjacent to or upwind of the building, proximity to agricultural activity, airports, etc.) as well as climate.

Assuming (albeit incorrectly) that reflectivity retention is solely affected by climate, relying on a single data point that represents a very limited portion of the country and applying it to the entire country does a disservice to those owning the vast majority of buildings in the country, those which are located in climates zones that are not hot/humid. This approach is likely to hinder the adoption of cool roofing outside the hot humid climate zones. Designers, building owners, etc. rely on the use of a variety of calculators or software programs to estimate the benefits of using cool roofing material. Making such calculations based on ENERGY STAR data, based on the most severe



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region of the country may result in the false impression that cool roofs are not beneficial in certain climate zones, inadvertently justifying the use of non-cool roofing materials in such locations, when in fact a more accurate or representative aged reflectivity value would demonstrate cool roofs to be beneficial in such locations.

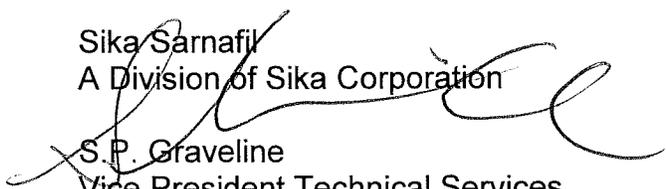
ENERGY STAR and the Cool Roof Rating Council (CRRC) are the only two credible, reliable third party sources for new and aged reflectivity data for roof materials. The vast majority of ENERGY STAR listed roof materials are also CRRC listed, and most vendors are likely using the CRRC as their third party certification body. Having a noteworthy difference in values listed for the same materials due to different weathering protocols will surely be very confusing for designers, owners and other users of the data.

The use of data averaged out over at least three climate zones has proven to yield good, representative values for design purposes for decades now. The proposed change will be disruptive, confusing to the consumers and users of cool roof materials and may inadvertently result in a reduction in the use of cool roofs. We urge the EPA to reconsider this proposal, and to re-instate the requirement for aged reflectivity testing to be conducted in three different climate locations, ideally in alignment with those defined in CRRC 1.

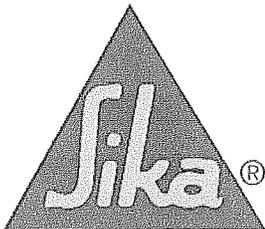
We appreciate the EPA allowing for approximately 42 months notice in order to allow manufacturers to be in compliance once the revised program is implemented. If there are to be additional rounds of comments and discussion, we would propose that the implementation date be pushed out to allow for the same amount of time (approximately 42 months) from the date the program revisions are formalized, to achieve compliance.

We thank you for this opportunity to provide our input to the program. Please do not hesitate to contact the undersigned at (781) 332 3209 should you have any questions regarding our proposed changes to the draft documents.

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S.P. Graveline
Vice President Technical Services

Cc: B. Whelan, J. Schwetz, M. Darsch, K. Foley, J. Thomas



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