

PALMER ASPHALT COMPANY

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July 11, 2013

Mr. Steve Ryan
Energy Star Roof Products Program Manager
US EPA, Energy Star Program
Office of Air and Radiation
Washington, DC 20460

Via electronic delivery to: Roofs@energystar.gov

Subject: Energy Star Program Requirements, Draft 3 Version 3.0 Roof Products Specification
And Draft 3 Test Method: Maintenance of Solar Reflectance

Dear Mr. Ryan,

Following please find our comments in response to the Energy Star Roofing Products Draft 3 Test Method.

CLIMATE ZONE WEATHER TESTING

1. Energy Star should list the exact States and or portions of the applicable state associated with each specific climate zone.
2. Objection to all stakeholders being required to test their products in each climate zone. All stakeholders and potential Energy Star roofing product producers or sellers may not offer their products for sale in each climate zone. This puts an unfair and inequitable financial burden on those stakeholders who sell their products regionally while lowering the cost for national sellers. The end result of testing in all climate zones will result in either false or unscientific results of products since the average result will most likely differ from where these products are actually used.
3. It is suggested that Energy Star create a designation of Zones 1, 2 and 3 and a producer's product listing can contain that specific zone where their products qualify. This is an easy remedy.
4. Use of regional climate zone designations clearly will provide more accurate data for the user be they private or public / government properties.

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5. If Energy Star should not accept this accurate product representation by climate zone than Energy Star should clearly state on all websites, literature, etc. that the values achieved are “averages only and the results achieved may differ based on geographic areas of use.”

TEST REQUIREMENTS

Section 4.3 Changes to Product Formulation

- Energy Star should clearly define what is a “fundamental element” change instead of listing just “such as base latex.” Energy Star should be specific in listing what exactly comprises a “fundamental element.”
- Section 4.6 Energy Star should allow the washing of panels prior to testing. The reason for this is that if a panel is tested after heavy, wind driven rainfall it is likely that there will be less dirt on the surface and the results would most likely differ from panels that are not tested after a heavy, wind driven rainfall. A more accurate comparison by product producer would be made if all panels were cleaned prior to testing.

EFFECTIVE DATE

Objection to effective date. It is suggested that the revision be in effect four (4) years after the final revisions are in place. This allows industry and potential new entrants to adjust to new and what may be evolving protocols. Apparently a sufficient enough number of stakeholder have voiced a similar opinion as evidenced by the highlighted mentioning of stakeholder objections.

It is suggested that this version should contain language to accept accelerated aging in the event DOE creates an accepted accelerated aging model.

STAKEHOLDERS SUGGESTIONS

Energy Star should adhere to their published comments regarding transparency in communications. Any and all stakeholders and interested parties who make comments should have their company name, association, etc. clearly attached to all comments as listed in Energy Star authored documents. This is not the case as evidenced in 5. Effective Date in the box listed that reads: **“NOTE: Several Stakeholders”**. Those stakeholders should have been listed. It would be of value to know how many and what percentage of stakeholders have expressed this concern.

ACCELERATED AGING

Palmer Asphalt Company agrees with accelerated aging protocol. It would be of value to advise where DOE is at in this process and how stakeholders and interested parties can assist in this effort.

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Thank you in advance for the acceptance of our comments and the continued opportunity to be a valuable Energy Star stakeholder and continue to assist in the positive objectives of the program.

Sincerely,

Van Ripps

Van Ripps
President

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