



July 12, 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](mailto: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,

I am writing on behalf of the Roof Coatings Manufacturers Association (RCMA) in response to your request for comments by July 12, 2013. RCMA is the national trade association representing the manufacturers of cold-applied coatings and cements used for roofing and waterproofing, as well as the suppliers of products, equipment and services to and for the industry.

Draft 3 Version 3.0 Roof Products Specification

Section 2.2 of the ENERGY STAR program requirements states that "roof products intended for use on siding or walls, are not eligible for ENERGY STAR under this product specification." RCMA believes that wall coatings should be included within the program. Investigations that have been conducted indicate that elevated wall reflectance can have an impact on cooling costs. As a result, there would be a benefit in establishing a cool wall coating level of 40 percent reflectance or higher. Or as an alternative, wall coatings and siding could be included in the requirement for steep slope roofing.

Climate Zone Weathering Testing

The current proposal states that products can qualify by using the average of tests conducted in three weathering farm locations. EPA has also added definitions for these weathering farm locations based on definitions found in the CRRC-1 Standard. The current CRRC "Test Procedure" for "Steep Slope roof products and coatings" states that "the samples shall be exposed at a slope between 2:12 AND 12:12 (4:12 Recommended)". RCMA believes the slope range is too broad, limiting the possibility of comparing apples to apples depending on the slope selected by each manufacturer. We recommend that either the slope range be narrowed down (perhaps less than 6:12 since it is closer or more representative of a typical sloped roof), or that the weathering test slope selected by the manufacturer be listed along with their product.

Thank you for your consideration of our comments. Please feel free to reach me if you have any questions.

Sincerely,

John Ferraro  
RCMA Executive Director