



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

June 21, 2013

Dear ENERGY STAR[®] Roof Products Stakeholder or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is pleased to share the ENERGY STAR Draft 3 Version 3.0 Roof Products Specification and Test Method for Roof Products: Maintenance of Solar Reflectance. Interested stakeholders are encouraged to submit comments to EPA **by July 12, 2013**.

Similar to Draft 2, the focus of this draft of the Version 3.0 Roof Products Specification and Test Method is the use of weathering farms. EPA considered all comments received in response to the proposed Draft 2 Version 3.0 specification, which can be found at www.energystar.gov/revisedspecs.

Climate Zone Weathering Testing

In Draft 2, EPA indicated an interest in single zone testing for aged reflectance in an effort to balance costs incurred by manufacturers with EPA's interest in maintaining a reliable and comparable listing of qualified roof products for stakeholders. After considering stakeholder input concerning multiple climate zone locations, the Agency is proposing in this Draft 3 that products qualify under Version 3.0 using the average of tests conducted in three weathering farm locations i.e., hot/humid, hot/dry, and cold/temperate. In support of this proposal, EPA has added definitions for these weathering farm locations in Section 1 of the attached Draft 3 specification, based on definitions found in the CRRC-1 Standard.

EPA recognizes aged reflectance values will vary depending on the climate. For example, a hot/humid climate captures the effects of pigment breakdown and biological growth, but not the effects of winter weather and soot build-up found in other areas. Requiring that products be tested in more than one climate zone and using the average across these zones for qualification will produce a more representative performance value that takes into account these variances and provides for a fair comparison across the many different technologies.

Note that EPA has updated the reference to CRRC-1-2010, S.2.6.A in Section 6 of the Test Method, which captures all three climate zones proposed for ENERGY STAR qualification under Version 3.0.

Accelerated Aging Method

EPA remains interested in an accelerated aging method and will continue to closely monitor efforts by the U.S. Department of Energy (DOE) in pursuing its Advanced Surfaces (Accelerated Aging) Project. EPA encourages partners to stay engaged in this process and provide feedback on this alternative test that could help to address the length of time required for qualification. Once EPA has reviewed and is satisfied with the integrity of the test method, EPA will adopt this method as an accepted alternative to the proposed weathering farm test procedure and could potentially be available before the effective date of Version 3.0. EPA will also continue to accept products tested in accordance with the climate zone weathering requirement detailed in the Version 3.0 specification.

Specification Effective Date

An effective date of March 1, 2017 is proposed for Version 3.0. Taking into account the need for a Draft Final, this date allows a period of 3 years and 6 months from the anticipated finalization of this specification. As noted in Draft 2, all products must be third-party certified to remain ENERGY STAR qualified. Products currently on the qualified product list that have not been third-party certified will need to be retested to remain qualified. However, products that have been tested on weathering farms in accordance with the requirements of Version 3.0, but not third-party certified, can remain qualified by having the original testing data submitted to and approved by an EPA-recognized certification body.

Comment Submittal

Stakeholders are encouraged to submit comments on the Version 3.0 Draft 3 specification and Draft 3 Test Method to Roofs@energystar.gov by **July 12, 2013**. All comments will be posted to the ENERGY STAR Product Development website at www.energystar.gov/revisedspecs unless the submitter requests otherwise.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Your input is very valuable during this specification revision process. Please direct any specific questions to Steve Ryan, EPA, at Ryan.Steven@epa.gov and (202) 343-9123 or Michael Holzheimer, ICF International, at Michael.Holzheimer@icfi.com and (202) 862-1584.

Thank you for your continued support of ENERGY STAR.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve J. Ryan". The signature is fluid and cursive, with the first name "Steve" being the most prominent.

Steve Ryan
ENERGY STAR Roof Products Program Manager