

Dear Mr. Anderson,

BondCote has never agreed that the EPA's practice of publishing comparative test results of competitive roof membranes should be within the scope of the ENERGY STAR program. Regardless of how reflective our product is, there will always be one out there that is more reflective, even if the difference provides an insignificant energy savings to the building owner. Only one roof product manufacturer can have the highest solar reflectance. Our belief relates to emittance as well. Unless the EPA agrees to publish only whether a product complies or not, we would be against the requirement for testing and reporting of thermal emittance. We are also not in support of the limitation on cleaning for the same reason. A manufacturer with more installations can more readily find roofs that have less soiling than others can and publishing actual comparative numbers becomes a marketing tool for the manufacturer with the better numbers. We feel that only compliance with the ENERGY STAR requirements should be allowed.

For background, BondCote has produced a roofing product that is highly reflective (currently tested at .79) for almost 30 years now. In addition, our emittance is tested at .94, so we are not concerned because we have difficulty complying with the requirements. We are a small manufacturer and the EPA's specification and their practice of publishing actual results rather than pass/fail seems to benefit larger producers by benefiting manufacturers who can easily select a roof that may have less environmental residue than others, CRRC ages all membranes in similar environments (solar radiation, roof slope, temperature, etc.). We are limited in our selections. While we agree wholeheartedly that washed or cleaned samples can be misleading, we also feel that aged samples from different geographic locations and climates are misleading. Especially since the EPA insists on making public the actual result rather than simply a manufacturer's conformance with the requirements of ENERGY STAR.

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