



August 16, 2006

ICF International
9300 Lee Highway
Fairfax, VA 22031

Attn: Rebecca Duff

Re: ENERGY STAR Version 2.0
Final Draft

Dear Ms. Duff:

HENRY Company is the largest Roof Coating manufacturer in North America with seven manufacturing facilities in the United States and two in Canada. We are also a California based corporation and produce both White (and other color) Elastomeric Cool Roof reflective coatings and Aluminum Cool Roof reflective coatings. We are also an ENERGY STAR Partner.

We are also members of the Roof Coating Manufacturing Association and Asphalt Roofing Manufacturers Association and also have discussed our concerns with Steve Ryan at meetings that he has attended on Energy Star Version 2.

Our comments below are related to the Low Slope Roof Products only.

The arbitrary removal of a class of reflective roof products namely Aluminum Roofing Coatings under ENERGY STAR Version 2 which are used in certain climate zones and areas of the United States is irresponsible and senseless. We encourage a review of the proposed SRI reflectance levels of 75 and 53 and thermal emittance of .75 to allow quality Aluminum Roof Coatings to continue to be given ENERGY STAR approval.

It should be made clear that Aluminum Cool Roof Coatings are highly reflective and can be applied under certain climate conditions when Elastomeric roofing coatings cannot. It can also be shown in some Northern Climates that Aluminum Roof coatings have better energy saving results than Elastomeric Coatings.

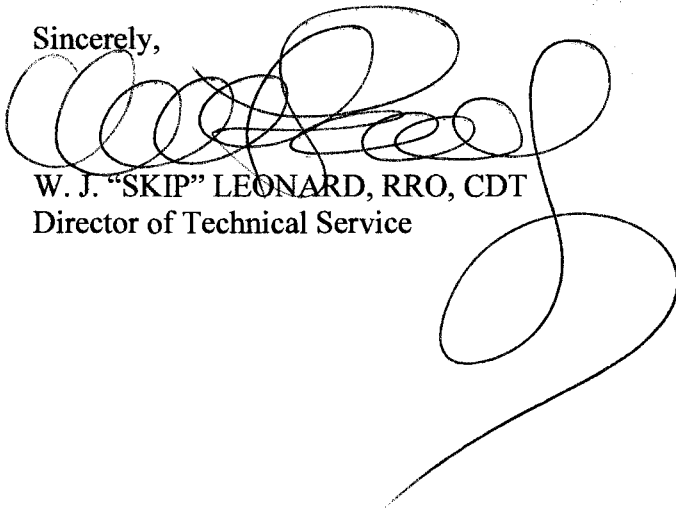
In looking at our own California sales data we see our Elastomeric Cool Roof coatings shipments have increased dramatically but interestingly enough our Aluminum Cool Roof reflective coatings are increasing at a greater than 25% percent rate. Part of this is attributed to the many different

climate zones in the California market. Many of the Energy Star products are based on climate zones but the Roofing ENERGY STAR program does not take this into consideration.

In conclusion, Henry Company strongly supports the ENERGY STAR program in the education of the consumer but would respectfully ask the Environmental Protection Agency to reconsider the proposed SRI levels to be inclusive of both quality Cool Roof aluminum-pigmented and Elastomeric coatings to insure maximum energy savings for the entire country and consistent with other product categories under the ENERGY STAR program.

Thank you for your consideration of our position. I can be reached at 214 764-3022 or sleonard@henry.com with your comments

Sincerely,

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long trailing line that extends downwards and to the right.

W. J. "SKIP" LEONARD, RRO, CDT
Director of Technical Service