

August 16, 2006

Rebecca Duff  
ICF International

Dear Ms. Duff:

As the incoming President of the Roof Coatings Manufacturers Association (RCMA), some dozen or more years ago, I was a member of a small officers group of the leading roofing industry associations that met in Washington, D.C. to listen to presentations by Dr. Hashem Akbari of Lawrence Berkeley Laboratory and Dr. A.H. Rosenfeld of the Department of Energy.

I will certainly give them credit for getting right to the point they wished to make. And that point – they wanted to make all roofs, buildings and pavements in California white – they wanted shade trees removed from alongside of buildings, residences included, so that the trees would not shade any white building or white roof or white pavement. No ‘ifs’ or ‘buts’. No thought of individual choice or other opinion considered or allowed.

Since the ENERGY STAR Roof Products Program first commenced I have found that those responsible for the program were excellent at hearing the comments they received but, from my perspective and from my six inches of documents on file, not any better at listening than Drs. Akbari and Rosenfeld. And, the worst part about all of this is that my tax dollars and those of other producers and sellers of the largest volume class of reflective coatings and the users of these products, who I believe are adversely affected by the decisions EPA makes, are used to support a program not likely to be in their interest.

All of the above having been said I want you to know that I am mindful of unique conditions in some areas of California that cry out for the relief that may be obtained from the establishment of rigid standards for roof products reflectance. However, I have my doubts that Drs. Akbari and Rosenfeld contemplated their austere program for California traveling throughout the entire United States.

What I cannot understand is why in Table 1 –Specifications for Low-Slope Roof Products, Performance Specifications, you would impose a ‘one size fits all’ Thermal Emittance requirement of Greater than or equal to 0.75. I believe the industry’s (RCMA) response to this Final Draft will illustrate that in significantly wide areas of the United States a thermal emittance of 0.40 will produce as great, if not greater, overall energy savings.

EPA has repeatedly responded negatively to requests for establishing different performance standards for roof products based upon geographic areas that would take into consideration the realization that weather conditions are not uniform throughout the

United States. As I looked at the ENERGY STAR website yesterday I noted a heading, “Home Envelope”. Under that heading there are three categories of products:

“Home Sealing (Insulation and Air Sealing)”

“Windows, Doors & Skylights”

“Roof Products”

In the first category ENERGY STAR shows “Recommended Levels of Insulation”. In the opening paragraph there is a sentence beginning, “The table below shows what levels of insulation are cost-effective for different climates and locations in the home.” The table shows three different climate categories, each with different standards set forth, and some of the different climate categories are even narrowed down to sections of specific states.

In the second listing for residential window, doors and skylights the criteria is “tailored to four Climate Zones.” And, the opening paragraph reads, “A product’s energy efficiency for a given climate is based on its impact on heat gain and loss in cold weather and heat gain in warm weather. Windows that are energy efficient in Florida will not necessarily be energy efficient in Michigan and vice-versa.” That certainly would hold true for roof products.

Thus, ENERGY STAR has established the precedent for incorporating into its standards recognition that differences in performance should be designated in different areas of the country. The map shown on the ENERGY STAR website for windows, doors and skylights might be a good place to start for Roof Products.

At the beginning of this letter I complimented Drs. Akbari and Rosenfeld for being good at getting right to the point. I think it is time that I do so. And, that point is, with respect to Version 2.0, FINAL DRAFT my company, Palmer Asphalt Company, supports the addition of Thermal Emittance to the Performance Specification in Table 1 of Version 2.0 at a level Greater than or equal to 0.40 for aluminum-pigmented roof coatings and also supports removal or reference to SRI Alternative in the same table.

We would have no objection to EPA publishing a statement to the effect that: ENERGY STAR qualifying products having the minimum emittance level of 0.40 may not produce the same energy savings as those products meeting a higher thermal emittance of 0.75 in those areas where both ambient temperatures and sunlight are at consistently high levels.

If ENERGY STAR fails to make the changes we suggest it will be at odds with its own policy as respect to the two other categories of Home Envelope products, will impose a needlessly high cost on many property owners without assuring they see a reduction in energy consumption and energy cost, remove from the market a product line that has provided dependable energy and life cycle roof savings and put at financial risk the adversely affected coatings producers together with the users of their products and those both producer and user employ. WHY, YES, WHY would ENERGY STAR do this???? Incidentally, I’d like an answer.

Respectfully,

PALMER ASPHALT COMPANY  
Lewis S. Ripps