

August 16, 2006

To Whom it May Concern

Re: Energy Star Version 2.0 Final Draft

The Energy Star Program would like to be more consistent with the Cool Roof Rating Council protocol, so adding the emissivity standard is understandable. Adding SRI as additional criteria for measuring the radiative properties of a roof surfacing is also a good feature. However, setting the new criteria to almost mirror the California Title 24 Energy Standard is not consistent with the goals of the Energy Star Program, which is to help consumers identify reliable energy efficient products.

The California Title 24 reflectivity/emissivity requirements are not applicable to the entire United States. What may be suitable for California is not necessarily suitable for the rest of the country. White waterbased roof coatings have a much greater application window in that temperate part of the country. However, a majority of the United States has a less forgiving climate and relies on the more forgiving application qualities of oil based aluminum coatings.

Aluminum coatings may not offer as high emissivity as other white roof surfacings, but they do provide much greater reflective performance than other common dark colored roofing products. Plus, aluminum coatings have excellent life expectancy, are cost effective, and also provide certain fire resistive properties in roof construction. To effectively "write off" a proven and reliable reflective coating category is not consistent with the goals of the Energy Star Program. Even though Energy Star is a voluntary program, this program is used to drive numerous roof specifications and it provides considerable influence in the market today.

I propose the aluminum coatings category be re-evaluated for use within the Energy Star Program and a revised SRI rating of 60 be put forward as a minimum value for initial radiative properties.

Tremco is a roof systems and coatings manufacturer and a US EPA Energy Star Partner. Aluminum coatings are only one of the many Energy Star roof surfacings we offer. Tremco is a member of the Roof Coatings Manufacturers Association (RCMA) and is in agreement with their public comment on this issue.

If you have any additional questions on this, please feel free to contact me at (216) 766-5511.

Sincerely,

Kurt Sosinski, CSI, CDT
Director of Product Resources