

From: Snyder, Richard A. (Roofing) [mailto:Richard.A.Snyder@saint-gobain.com]
Sent: Monday, May 09, 2011 1:02 PM
To: ESTAR_Verification_Testing
Cc: Chad.Fisher@us.ul.com; Matt.Overbee@ulenvironment.com; Brandt, Jim C.
Subject: Verification Testing Concerns - Asphalt Roofing Products
Importance: High

Kathleen,

I have many concerns and questions about Energy Star Verification program as it relates to Asphalt Roofing Shingles. I am VERY concerned because the attachment seems to imply that a decision on this matter could be made TODAY!!! Is that a possibility? I am not aware of much discussion going on, but if there is please make it public and let me know where to view it.

1) My first question is...is the attached document meant to cover asphalt roofing shingles? Many of those I have spoken to say NO, but I need confirmation.

2) At some point the specifics for Verification Testing of Asphalt Shingles will be defined. When that occurs, the *main* question I have is whether or not Energy Star will incorporate logical statistical analysis of SR data obtained during Verification testing of roofing shingles. It appears that you plan to do so for *all other* Energy Star Qualified products, but perhaps NOT for roofing products. By that I mean specifically that a minimum initial SR value of 0.250 will be required in Verification Testing, with NO rounding or statistical allowances! It makes no sense to me that you would test the SR of a single bundle of roofing shingles (known to have built in variations) with equipment that is known to have significant variability, by different equipment operators (known to introduce additional variability), on material that may have been in storage for some time (known to be subject to temporary "staining" from oil migration to the granule surface, but which permanently washes off within in 6 months), and then decide that, because the SR result is 0.246, the material FAILS Verification testing and must start from scratch with full three-year aging!

It is important to note that the Cool Roof Rating Council (CRRC) and the California Energy Commission (CEC) allow a -0.05 SR leeway in their verification test protocol, such that shingles (or other roofing materials) originally tested and rated to have an initial SR25 value (for example) need only to have a verification retest value of SR20 to pass. They understand the degree of variability that can occur (as I noted above). Based on these "real-life" issues and the less than critical need to be exactly SR25, the EPA/DOE restriction that a retested value must be NO LESS THAN SR25 is extremely difficult to justify!

I have alerted Underwriters Laboratories Inc. (our CB) regarding CertainTeed's concerns on EPA's approach to verification testing of asphalt shingles (I have copied UL on this email). Please keep them and me fully apprised of the progress with this issue.

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