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Eamon Monahan
ENERGY STAR Program
U.S. Environmental Protection Agency
Subject: Draft Certification and Verification Requirements

June 25, 2010

Dear Mr. Monahan,

The Cool Roof Rating Council (CRRC) appreciates the opportunity to comment on the Draft Conditions and Criteria for Certification Bodies for the ENERGY STAR® Program. Please find below our recommendations to strengthen the ENERGY STAR® criteria. In addition, kindly consider our proposal to serve as the rating entity for roofing products.

ISO/IEC 65 Accreditation (Section 1.a.)

The CRRC is not ISO 65 accredited. We request that the EPA remove this as a strict requirement for Certification Body accreditation, and perhaps allow for equivalent status. This requirement could pose hardship for smaller non-profit organizations interested in serving as an EPA Certification Body.

ENERGY STAR Laboratories (Section 1.f.)

The CRRC program will only accept energy performance ratings from our Accredited Testing Laboratories, and will not certify data provided by other testing labs. As mentioned in the CRRC comment letter submitted for the ENERGY STAR Laboratories Criteria, allowance of manufacturer testing laboratories to provide roofing radiative measurements introduces a loophole in the integrity of the ENERGY STAR program. The CRRC strongly recommends that the EPA remove this allowance from the verification program.

Manufacturer Control Documentation (Section 1.g.)

In order for a roofing product manufacturer to become licensed with the CRRC, they must submit documentation regarding a Quality Control Program, including contact information for the Quality Control personnel. However, the documentation requirements specified in the EPA Certification Body criteria uses the following language “Examples of such documentation *could* include” therefore what precisely will the EPA require for this documentation?

ENERGY STAR Qualification (Section 2)

The CRRC program is setup as a rating program, providing credible energy performance radiative property ratings for roofing products. The program lists these ratings as a free public service on our online Rated Products Directory and does not specify any minimum requirements to be qualified as a cool roof product. The CRRC Rated Products Directory does not actively specify whether a product meets or exceeds performance parameters specified by any program (like ENERGY STAR) or code.



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However, determining if a product meets ENERGY STAR qualifications is currently feasible under CRRC's Rated Products Directory search function. As the listing of ENERGY STAR qualified products will be maintained by the EPA, there may be no conflict with the CRRC providing a listing of products that meet ENERGY STAR qualifications. This change in CRRC role from a rating body to a body that verifies products meet a program (like ENERGY STAR) requirements, may require a CRRC Board and Membership vote of approval.

Qualification Labeling (Section 2.a.ii.)

Currently EPA criteria language specifies: ENERGY STAR Partner attestation that its qualified product(s) will be labeled according to the specific and relevant ENERGY STAR program requirements. CRRC licensees can choose to use a CRRC label on their rated products. In order to do so, they must submit a Licensed Seller or Other Manufacturer Agreement, which confirms their commitment to follow the CRRC program requirements for using the label. The CRRC recommends that the EPA develop a similar agreement form for ENERGY STAR Partners to sign off on. It does not appear from the Certification Body criteria that the EPA requires that the CB monitor for labeling violations and follow-up regarding correction actions, and the CRRC advises the EPA to keep this policing task internal to the ENERGY STAR organization.

Verification Testing: Product Selection Guidelines (Section 3.a.i.3.)

Under CRRC Random Testing protocol, products are selected with a software program that has the following parameters:

- Products will be selected at random, but the probability of being chosen increases for products not selected in previous years and listed in the directory for many years. If a product is sampled or added to the directory the previous year, then it has one chance of being picked the following year. Products that were sampled or added to the directory two years past have two chances, etc. It is still possible for products to escape sampling, but the longer they escape sampling, the more likely it is that they would be selected the next year.
- Products that failed testing in the previous year and have been resubmitted into the CRRC Rated Products Directory are automatically selected.

Differing from the EPA Certification Body criteria, the CRRC does not put a higher priority for random testing selection on new market products, high market sellers or referrals from third parties. The organization does not have a mechanism in place to determine which products are high market sellers. Additionally new market products will be difficult to determine as products are not necessarily added to the CRRC database at the same time they are placed on the market. The CRRC does have a process in place to verify questioned products, which is aligned with the Challenge Testing process outlined in section 3.c. As this process is already accounted for separately under the Challenge Testing process, it is redundant and should be additional to the Verification Testing selection. The CRRC recommends that for roofing products the EPA remove new market products, high market sellers and referrals from third parties from the verification testing selection guidelines.



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Verification Testing: Procurement of units for testing (Section 3.a.i.4.a.)

The CRRC procures random testing samples primarily off-the-line from third party Quality Assurance Organization collection agencies (75%) and secondarily off-the-shelf from listed contractors and distributors (25%). For roofing products off-the-shelf collection is a far more difficult method for product collection. It is less time efficient as well as problematic to gather the products in the sizes needed for product verification testing rather than large batches as sold to the market. The CRRC collects off-the-shelf products from manufacturer provided contractors and distributors. Though we agree that procuring products direct from the market is ideal, our program has found that in order to complete yearly random testing within an acceptable time frame, collecting products using third parties as the main source is necessary. The CRRC recommends that the EPA modify the prioritized order with which roofing products are procured.

Product Specification Audit (Section 3.b.)

The CRRC does not conduct random inspections at manufacturer locations. This is a significant task to perform and would be costly for the organization to take on. For roofing products, the 10% Random Verification Testing is a more credible confirmation process than conducting inspections at manufacturing locations. An onsite inspection may not yield the needed criteria for noting whether product meets energy performance qualifications. Additionally, a manufacturer may not be willing to provide a product specification to an outside body, as much of this information is considered proprietary. The CRRC does have reformulation procedures in place, as well as methods to deal with manufacturer changes in ownership. The CRRC recommends that the EPA remove the requirement for onsite inspections of manufacturers from the Certification Body criteria.

In addition to the above recommendations, please find below other issues of concern, which have not yet been addressed in the EPA Criteria documents.

Roofing Products Aging Requirements

Unlike many other ENERGY STAR products, the energy performance of roofing products may significantly change with age. As such the CRRC has developed processes to expose products to three-year outdoor weathering in three different climate zones using accredited Test Farms. How does the EPA intend to account for roofing product aging? Where do Test Farms fall under in the EPA verification process, as it is not a laboratory? Will the EPA establish chain of custody rules between labs and test farms if it allows for a Certification Body that is not the CRRC?

Test Methods for ENERGY STAR Roofing Products

The CRRC employs standardized ASTM test methods and when necessary, rigorously researches and develops new test methods with national laboratories and other stakeholders to measure the new products with accuracy and consistency, in accordance with the CRRC-1 Product Rating Program Manual. What will be acceptable test methods for ENERGY STAR roofing product verification?



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Overview

The CRRC's comprehensive and independent Product Rating has operated for over 10 years, developing processes to manage complex testing and procedural issues and ensure accurate ratings for roofing products. The CRRC hopes that EPA recognizes the effort our organization has put towards ensuring credible energy performing roofing products are sold on the marketplace.

There is strong alarm and concern amongst CRRC licensees (roofing product manufacturers) regarding the possibility that their products may need to be rated under multiple rating systems (specifically under the CRRC as required for the California Energy Commission and the potential for a second system under these new EPA verification guidelines). This would result in a significant financial burden for the roofing industry. Current EPA policy allows for the acceptance of CRRC ratings, however if the CRRC does not meet the final version of the EPA Certification Body Criteria, will rated CRRC products cease to qualify for ENERGY STAR ratings?

The variety of products rated under the ENERGY STAR program is considerable and each has their unique nuances and testing needs. Given these significant differences, it seems difficult to place each product type under a one-size fits all verification system format and we believe each product type can benefit from a unique system approach. The CRRC has already developed this approach for rating roofing products, and respectfully proposes to be appointed the rating entity for the ENERGY STAR® qualified roof products program.

Thank you again for considering our comments. In particular, we hope you favorably consider CRRC's proposal for appointment as the rating entity for the ENERGY STAR® qualified roof products program. Please contact me with any questions or concerns.

Sincerely,

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