

ENERGY STAR Program Requirements for Roofing Products

Webcast Question and Answer Session Transcript

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Questions and Answers

Hashem Akbari: Thank you. I have a question. You know of all this certification bodies, there is only one certification body that rigorously looks at a standard, developed procedure, and it is a member based organization and that is CRRC. Many of the things that you are mentioning that EPA is doing, is exactly what CRRC and its board have been doing and doing within the last – within the last 15 years.

I am really, really positive—and of course I should mention that EPA does have an ex-officio board member on the CRRC. Why are we doing all this repetition particularly in knowing that all the other four that you mentioned that are not – those are not member societies that are doing things in a vigorous and standard way? Why are we just not into differing to the CRRC label which in a way is exactly what you are trying to do.

Eamon Monahan: Sure, it's a fair question and I think I understand it fully. The idea is, you know EPA, we had no interest in – and nor really are we allowed to sole source this function. We can't really point to the CRRC and say ENERGY STAR Partners must go through this organization. We had to – we had to open it up so that anyone that wants to participate can. And so we have those four organizations.

And I also don't think it's totally fair to say – say that those organizations can't do what we need them to do for ENERGY STAR purposes. And so all these organizations are accredited to ISO Guide 65 which is international standard that governs how a certification body should operate and in addition they signed on to all of our EPA-specific requirements and those are on their Web site so we had a lengthy application process with all of them including our review of all their documentation and in-person interviews to make sure that they understood everything that they were going to have to do in all their product categories. So, while you're right that the CRRC has long been doing this kind of thing and – and there are ENERGY STAR partners that have long been working with them and probably this really won't be anything for them, partners that for and for whatever reasons they choose to not participate in the CRRC program or – or just in general. There's more choices so this – all of the organizations that are recognized by EPA that do this, can do what we need them to do. And so, you know, we're not forcing anyone to go with any one organization nor do I think that we have created any kind of a – overly burdensome addition to what our partner has to do to qualify their products. I hope I've addressed your question. Did I – did I miss anything?

Hashem Akbari: I think that you know this is going to be a lengthy discussion. There's going to be a major, major difference as an example CRRC has been constantly working developing procedures to major . . .

Kathy Diehl: Hashem if I could interrupt for just a second. We can only stay on for another 15.

Steve Ryan: Hashem, this is Steve. You said this could be lengthy. I'd be happy to talk to you more about this offline. . .

Hashem Akbari: Ya, let us do that. That's the reason I wanted to raise it.

Steve Ryan: Yes, because there's many issues at play here and I can give you. Behind the scenes right now, one issue with the CRRC they are only going to test and the C.B.s can do this with roofing they can anyway. So the CRRC is only going to test in the way they are only comfortable with and that's how they're doing it.

I would suspect a lot of the majority of qualified products that Eamon mentioned under the new test procedure, probably went through the CRRC because many people do business in California and that's when they are going to using them anyway. But, so you have the ENERGY STAR specification and test procedures and there are some differences there. And the CRRC may not – aren't comfortable you know, right now, accepting those other, you know, in-field measurements for example, are allowed under our current specification.

So you need to allow other organizations that aren't part of the CRRC and then they are not bound to be, they don't have to be. It's not a requirement at ENERGY STAR to be able to, at least under the current specification, be able to test their products through a C.B.

But we are, and I could talk to you about this further but we're – we're working right now behind the scenes on changes to the specification not so much in terms of – not in terms at all; in terms of initial solar reflective or the actual values but in terms how products are tested, you know, on test farms or whatever and how many samples, sizes, and what test procedure and so forth. And I suspect that it will bring us more in line with CRRC. Did that help?

Hashem Akbari: [Inaudible]

Kathy Diehl: Let's see if there is more. If there's a question, other folks does not we can (inaudible).

Joe Sorrentino: This is Joe Sorrentino. You mentioned five labs. I'm familiar with CRRC, I think you mentioned Inter tech, U.L., I thought I heard Key Stone and – and the other one I did not have.

Eamon Monahan: Sure, and these are certification bodies (C.B.) rather than labs.

Joe Sorrentino: Yes, excuse me, right.

Eamon Monahan: The fifth one is IAPMO that's kinda of how it sounds. It's I A P M O. They are out in California.

Joe Sorrentino: Thank you.

Eamon Monahan: Yup.

Kathy Diehl: Next question, are there more questions? If you want to ask a question, remember you need to press pound six to un-mute your phone.

Ryan Mills: Hi, this is Ryan Mills of Henry Company. One of the things on here for unit procurement is to get the product off the shelf where feasible. And I was just wondering how that's going to be a level playing field with all the manufacturers when there's many manufacturers that only sell direct to contractor. And there are other manufacturers that sell both to retail locations and direct to contractor for certain products. So how – how do we make sure that's going to be the same across the board?

Steve Ryan: Sure, that's a fair question and Eamon, we'll have to talk about that off - if you have a direct, answer right now, I mean, go ahead.

Eamon Monahan: I do, and that – 'cause this would be the case in a few other product categories as well. Certification bodies will have procedures for that and so if – if it's really something that can only be done like a direct-to-contractor type thing, they have – they have ways to where they can order it blindly so that it doesn't need to go – it doesn't have to come directly from the market. There's a – they can – they can place some kind of blind order and do it that way.

Ryan Mills: OK. I do have one other question too on the three year age testing with the new criteria; do we need to have that three year age testing to get the ENERGY STAR label?

Steve Ryan: There's no change to that, yes of course—for initial testing, certainly. To get your product qualified as ENERGY STAR and have a C.B. verify it, you have to have that three year age testing. That does not change but . . .

Ryan Mills: Is there any – is there any acceptance of looking at computer modeling for that three year time period, so you can develop the product?

Steve Ryan: No, you know it's good we had the Heat Island group on here, and Hugo doing that presentation. I mean just look at that, go back to that slide which shows the deviation in three year testing. When we initially put that requirement in, it has never changed. It was done in coordination with industry and the integrity program, and it was really industry that wanted it. And so I realize things have changed, and we – we talk about the – I'm very sympathetic to the reasonings behind trying to go with something else obviously there's lots of new products coming out, you've gotta wait the three years but I think, when you look, we've never seen any good evidence that, you know this computer modeling accurately simulates what happens in the field. So we couldn't just do away with that for your requirement and how do you pick? You know, what computer models do you do?

Kathy Diehl: Hugo, do want to talk, speak to that at all?

Hugo Destailats: Yeah, I don't think it's a computer modeling that's actually measurement.

Kathy Diehl: Right.

Hugo Destailats: Right. You're talking about the slide number, let me see.

Steve Ryan: Five.

Hugo Destailats: Five. Right, those are all measurements.

Kathy Dieh: OK, so ah..

Steve Ryan: But I just pointed out that in, Hugo, those are actual measurements and it shows that three year age testing is important until you have a solid – a solid age testing protocol in place that we can't do, you know, anything else but what we have now.

Kathy Diehl: OK, next question. Remember ... Go ahead.

Matt Levinsky: This is Matt Levinsky, from Dow Construction Chemicals. This is just a quick question. Can you just briefly describe what the future is for product changes, when an ingredient is changed?

Steve Ryan: Yeah, who is this again?

Matt Levinsky: This is Matt Levinsky from Dow Construction Chemicals.

Steve Ryan: Oh, hi Matt. Did we correspond by e-mail by any chance?

Matt Levinsky: Probably, I think we did, yeah.

Steve Ryan: Yeah, 'cause I think I got the same question by e-mail through Kathy and my answer was, and again this goes back to the beginning of the program, that product formulation and the Heat Island group and Hashem and those can jump in on this as well: significant changes to the formulation can affect reflectivity of diversing product. So you know, we work with the manufacture to determine what, there are cases where reformulation does not and so, you know, we'll work with the manufacturer to – or I will, to see if this truly is, you know, just a minor, you know a minor reformulation but if it's a significant reformulation and reconstituting the actual coating in some way then it has to be retested.

Kathy Diehl: Next . . .

Steve Ryan: Does that answer your question?

Matt Levinsky: Not really because it just seems like a very wishy washy policy. That, like, if I'm looking from my point of view, I'm replacing the resin in there, which is a major constituent in terms of like percentage of the product, but like I may know from the composition of that resin that the product being replaced is a relatively minor change. It's just not clear to me what kind of bar there is and how much is being measured or if it's made clear. I guess what I was looking for is there a change from the previous program and then again like what is that, you know, what is the rule there?

Steve Ryan: The rule is, I didn't set that – that particular procedure in place because I wasn't here when the spec was set, but, I do know, again, this was done, you know, at the time of spec setting this was an industry back before stakeholder process and it was brought up that it was left somewhat vague on purpose because it's very hard to say what constitutes and then you could be denying products. It could be making products be retested. It was designed to be reasonable and somewhat lenient. It's just the process is to work with EPA if you're doing reformulation, and then say, hey, you know, I'm changing my product this way: is this is going to constitute a major reformulation and am I going to have to retest? And then it's a question of just sending me some data, talking to, you know, and me working with the folks who support EPA and the roofing products program and just looking at it and seeing is this a significant reformulation. The idea is not to just say, if you reformulate it all then you must – you know, if you do any changes you must retest. Because in many cases, you shouldn't have to. But . . .

Matt Levinsky: Right, and I accept that answer. I'm not trying to put you on the spot, I just know that some of the other organizations that are out there, my customers have seen wide inconsistencies and you know, kind of how those rules can apply. So that's the only reason I bring it up, again. . .

Steve Ryan: OK, well I'm open. Again, as I said, we're working behind the scenes to do to tweak the specifications. So this is something that can be updated, I'd appreciate feedback and then if people have suggestions in terms of language that can be put in there other than what's in there right now. Yeah, right now, it just says if you do there's a major reformulation to the product that could result in a change in reflectivity or solar reflectance then you must retest. If there's something better than that, then I'm open to stakeholders giving me feedback on that.

Matt Levinsky: OK, thanks.

Kathy Diehl: OK, Neelam, are we gonna get cut off right at five?

Neelam R. Patel: No, we have the phone lines for the next hour.

Kathy Diehl: Oh, all right. I know Steve has to leave but it sounds like we have time for a few more questions. Is there another question?

Penny Gift: This is Penny Gift with RRCI. I did have two questions; one if you could address very briefly describe the challenge testing after a product is qualified and then secondly, for Hugo, could you please address the timeframe as far as the age testing that you are doing for the laboratory and how you plan to utilize that information and that data.

Eamon Monahan: Sure, this is Eamon and I can address to challenge testing question. We included a clause for challenge testing in our requirements. It's frankly not something I see happening very often but the idea is that all of our certification bodies have to have a way to run a challenge test should they get a – a credible evidence that a product may not perform as it should. So the C.B. has total discretion to decide whether a challenge is valid or not. It's not as if a competitor can approach a C.B. and say, you know, I think my competitor's product doesn't perform as advertised. You know, there has to be some evidence to prove that and to my mind, I

really mean a whole test report; a competitor would have to go have someone's product independently tested and bring that to a C.B. to really initiate the challenge. So we have that in there as a C.B. sub-discretion to decide what's a valid challenge and there will be some kind of negotiation there.

So it's something that we wanted to allow for. I don't expect, given all the testing that we have up front and on the back end, it's not something I expect to be a real part of this program, and will certainly be the exception rather than the rule. Does that adequately address your question or I can give – I can give you some more details in a hypothetical if you want to call me offline.

Penny Gift: No, you've answered it very well, thank you.

Eamon Monahan: Sure.

Kathy Diehl: And you had a question for Hugo. Are you still on, Hugo?

Hugo Destailats: Yes, I'm here, I'm here. And the answer would be, well, currently the wait period for a natural exposure is three years and the mandate we have from DOE is to reduce that period through accelerated aging – sort of through the accelerated aging protocol that we are developing to somewhere between three and six months.

That would be the goal and as we stand today we can – we think we are confident we can meet that goal and then we will have a first version of that protocol and present it at our workshop during the summer and more finalized to us perhaps the end of this year. And then we expect to receive some initial feedback from early users and probably modify it based on that. But the idea is to contribute, to give industry a tool that they can use to advance their materials and bring materials to market in a much faster way than is currently being done.

It doesn't substitute the natural exposure of course, because there is no way you can really simulate 100 percent of what goes into a roofing material under three years of natural exposure under any circumstance using accelerated aging but you can surely – you can surely mimic the main features of that and that's what we're working now. We are trying to identify what the main features are and you can do this accelerated exposure test as a tool that gives you everything that allows the product to be, you know, satisfied or rated much a faster rate, or much faster speed. That's the goal. And does that answer the question?

Penny Gift: Yes, thank you. And would you then be considering perhaps this becoming an AFPM standard.

Hugo Destailats: Well, definitely, yeah. Yeah, we would be working with AFPM first and then also internationally with ISO to develop and – both U.S. and then international standards.

Kathy Diehl: Are there any more questions? We can open it up to any of the speakers. You want to ask a question, please press pound, six to un-mute your phone.

All right, well this concludes our conference call on the ENERGY STAR requirements for roofing products and I want to thank everyone who joined us, as participants, as speakers. I think it really pulled together very well and I hope that you will all take advantage of having each other's contact information, to further the efforts of creating roofing products that can ameliorate the concerns of both the climate change and the urban heat island effect. Thank you very much.

Eamon Monahan: Thanks a lot Kathy.