SUPERIOR PRODUCTS
INTERNATIONAL II, INC.

DOCKET
05-BSTD-1
DATE APR 12
RECD. APR 12 2005

October 19, 2005

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California Energy Commission / Buildings and Appliances Office
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Comments to:
2005 Building Energy Efficiency Standards
Proposed - California Code of Regulations, Title 24, Part 6, Section 118 (i) 3
Cool Roof Coatings Performance Requirements

Superior Products International II, Inc. (SPI) of Shawnee, Kansas offers the following comments for your consideration on the revision of the proposed California Code Regulations, Title 24, Part 6, Section 118 (i) 3 concerning the required dry mil thickness of 20 mils as the top surface of a roof covering.

1. **SPI asks that the applied minimum dry mil thickness of a roof coating only be specified by the manufacturer.**
2. It is understood that the required 20 dry mil thickness was established from the thickness required to run the ASTM D-6083 that was originally to be used. Though the ASTM D- 6083 was not used and was removed as test criteria, the thickness remained the same.
3. Though the ASTM D-6083 was not used, it is understood that the required 20 dry mil thickness would remain due to "public sentiment" of those involved in workshops where the requirement would have already met their particular criteria. It is the contention of SPI that the 20 dry mil thickness criteria would have been different if more companies in the coating industry around the country would have been involved at the time. Some other coating companies besides SPI have a dry mil requirement of only 10 dry mils. If SPI and others would have been involved at the time, the 20 dry mil criteria most certainly would have been different.
4. No testing was done to determine what the most effective over-all thickness would be, but rather the "speculation" that if a coating is applied thick enough, it would last for a certain period of time. If this be true, a coating made with the poorest quality of materials could meet the criteria and qualify to be a Title 24 cool roof, and yet wash away in 2 years.
5. SPI submits that a coating company's proof regarding their coating's history and performance in the field is allowed to speak for itself to their customers and the public. Proof and actual performance numbers are always better than hopeful speculation.
6. It is understood that all coatings deteriorate differently. When various coatings were tested during the California Cool Roof Program for Energy Star, most coatings tested had deteriorated in performance from 9%-21% over the 3 year period. The SPI coating's performance, along with a few others, only deteriorated 1% over the 3 years. Using these figures, some coating's performance would deteriorate by 70% over 10 years, while the SPI coating would only deteriorate by 3% in performance.

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7. SPI has determined through testing and field use, the proper dry mil thickness of their roof coating that considers performance, price, and duration. The largest distributor for SPI is in Japan (Daiko Shokai), and has used their product (SUPER THERM) for over 13 years coating in excess of 26 million square feet of roofing with excellent results. Using Superior Product's roof coating, Daiko Shokai now owns over 70% of the Japanese market share for the entire roof coatings industry in Japan. This distributor has tested coated roofs after 10 years in the field that are showing the same results as when originally tested.
8. A mandate of a 20 dry mil thickness will unnecessarily kill the opportunity for SPI to be competitive in the marketplace. The costs of shipping the product, the cost of additional coating, and labor costs to apply the additional coating will be doubled for no reason, and with no benefit.
9. In this time of high priced energy costs, SPI is secure in its belief that they have a product that can benefit the energy needs of those in California and other states where Title 24 may soon be adopted. It is simply asked that you do not deny California and others of an affordable solution to help with their energy needs.
10. SPI sincerely believes that 17 years of field studies documented by means of detailed charts and graphs, combined with thousands of hours of certified lab testing lends itself to a proven track record over mere theory or speculation of what a particular coating thickness and at what level of performance it could be established. Therefore, again SPI asks that the mil thickness requirement be revised from the required 20 dry mils to each coating manufacture being allowed to determine the proper mil thickness of their own coating.

In closing, I respectfully ask this question; simply because other coating companies require this mil thickness, is it fair to penalized SPI because they produce a product that is superior to others in the marketplace?

Sincerely yours,

SUPERIOR PRODUCTS INTERNATIONAL II, INC.

By: _____
Craig R. Smith
Technical Director