American Iron and Steel Institute

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20 September 2012

Mr. Ray Allshouse
Chair-State Building Code Council
State of Washington
P. O. Box 41449
Olympia, WA 98504-1449

Re: Adoption of amendment of the 2012 International Energy Conservation code (Commercial), WAC 51-11C
Section C402.2.1.1 Roof Solar Reflectance and Thermal Emittance
(Copy of proposed standard included with this proposal)

Dear Mr. Allshouse, and members of the State Building Code Council:

I am the Regional Director for the American Iron and Steel Institute, an institute which represents the steel producers of Canada, Mexico and the United States. We are taking the opportunity to forward our observations and recommendations as it relates to the proposed modifications to the envelope requirements, specifically Section C402.2.1.1.

We recommend the following modification:

Part 1:
Table C402.2.1.1
Reflectance and Emittance Options
(No proposed modifications to the table, but we propose to modify the notes)

a *(No proposed modifications)*
b Solar reflectance tested in accordance with ASTM C 1549, ASTM E 903**,** ~~or~~ ASTM E 1918**, or the CRRC-1 Standard**.
c Thermal emittance tested in accordance with ASTM C 1371**,** ~~or~~ ASTM E 408**, or the CRRC-1 Standard**.
d *(No proposed modifications)*

Part 2:
WAC 51-50-3500
Chapter 35 Referenced Standards
(Add the following referenced standard)

CRRC		
Cool Roof Rating Council **1610 Harrison Street** **Oakland, CA 94612**		
CRRC-1 Standard 2010	**ANSI/CRRC-1 Standard**	**T402.2.1.1**

Reason:

The Cool Roof Rating Council was created in 1998 to develop accurate and credible methods for evaluating and labeling the solar reflectance and thermal emittance (radiative properties) of roofing products and to disseminate the information to all interested parties. Supporters of this organization include the US-EPA, US-DOE through Lawrence Berkeley Laboratory and Oak Ridge National Laboratory, roofing product manufacturers, roofing consultants, State of California, etc.

The CRRC is incorporated as a non-profit educational organization for the following purposes:

- To implement and communicate fair, accurate, and credible radiative energy performance rating systems for roof surfaces.
- To support research into energy related radiative properties of roofing surfaces, including durability of those properties.
- To provide education and objective support to parties interested in understanding and comparing various roofing options.

The CRRC has developed both a cool roof product program and a cool roof standard. The proposal before you is to promote the use of the ANSI/CRRC-1 Standard only.

The standard is a testing and reporting type standard, and is non-proprietary. The standard covers the same subject test standards as is currently shown in the rule making proposal, plus includes methods for testing roofing products which are not suitable to be tested using the ASTM test standards. These include variegated roofing products, clay tile, asphalt shingles with multiple color granules, etc. Further, this standard outlines what constitutes aged testing, has an extensive definitions section, and defines what a report of results should contain.

This is an ANSI accredited document which currently goes through a consensus type updating process every three years.

The document is available at no cost to the general public at:
http://www.coolroofs.org/documents/CRRC-1Standard-finalANSI.pdf

Who has adopted or incorporated this document?

- International Green Construction Code-2012
- ASHRAE Standard 90.1-2010
- ASRHAE Standard 189.1-2011
- State of California, Title 24 Energy Code
- City of Philadelphia
- US-EPA Energy Star Roof Program

We feel that adding this document will enhance the Washington State Energy Code, and make compliance with the Section 402.2.1.1 more manageable and enforceable.

Sincerely,

Jonathan Humble, AIA, NEBCA, LEED AP-BD&C
Regional Director

CC: S. Hao, Cool Roof Rating Council

Attachment: CRRC-1 Standard 2010 pdf file