greenproducts

Friday, June 03, 2005

Mr. Bill Pennington
Project Manager
Energy Efficiency and Demand Analysis Division
California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814

Dear Mr. Pennington:

Per our communications with Ms. Elaine Hebert, I am writing in regards to the proposed performance characteristics listed in Section 118 of the Title 24 program scheduled to go into effect in October 2005.

Green Products, LLC is a manufacturer of biobased polymer liquid waterproofing and roofing membranes derived from soy oil. Our Environmental Liquid Membrane System (ELMS) designed for low slope roofing applications was created over 14 years ago with research funded by the U.S. Department of Agriculture and United Soybean Board. Our highly reflective (.77) and emissive (.93) solar reflective white liquid membrane was designed to handle the most rigorous applications in regards to exposure to Ultra Violet radiation and long term exposure to ponding water conditions that occur in low slope roofing. We have had numerous projects with our ELMS products in the State of California with great success, including one of our oldest applications being installed in the desert of Borrego Springs, California for over 12 years. Though our products are highly reflective and emissive and provide the solar heat gain reduction for energy savings that the Title 24 Energy Code was drafted for, our performance and testing characteristics are different from the generic performance requirements listed in Section 118. By mandating that all "Liquid Roof Coatings" fit into a specification designed for acrylic coatings, the Energy Code will stifle product innovations and newer technologies from entering the world of roofing and waterproofing.

Our ELMS liquid membrane products have been designed to provide a new waterproof surface to existing roofing systems. They are designed to handle prolonged U.V. and ponding water exposure. ELMS products have a permeability of less than 1 perm even when ASTM tested for 21 days of moisture vapor exposure. These products were also designed for maximum adhesion to substrate through surface penetration and bonding so that delamination will not occur. Our ELMS products are designed to have greater elongation then the substrate. Our products have been used to restore a multitude of roofs with customers such as SBC, Union Pacific and Coca-Cola and others. Our projects have even been used to restore historic landmarks such as the John G. Shedd Aquarium in Chicago where the roof is exposed to hot wet summers and extremely cold wet winters with long term exposure to ponding water conditions.

ELMS was also crafted with an environmental mission as well. We have designed our biobased products to provide innovation and superior performance characteristics as an alternative to petroleum based products. Our chemistries have been crafted with the environmental impact at the forefront. We are continuing to develop biobased chemistries that will make an impact on the environment. With the State of California's focus on energy reduction and environmental building practices, it is our hope that the California Energy Commission will take advantage of new and emerging technologies that will provide long term benefits to the State of California.

Sincerely,

J. Stanley Pepper
Managing Partner

Cc: Elaine Hebert, California Energy Commission

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