

DOCKETED

Docket Number:	15-AAER-02
Project Title:	Pool Pumps and Spa Labeling
TN #:	211044
Document Title:	E. Jess Tudor Comments: 15-AAER-02
Description:	N/A
Filer:	System
Organization:	E. Jess Tudor
Submitter Role:	Other Interested Person
Submission Date:	4/14/2016 10:23:13 AM
Docketed Date:	4/14/2016

Comment Received From: E. Jess Tudor

Submitted On: 4/14/2016

Docket Number: 15-AAER-02

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E. Jess Tudor March 30, 2016

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California Energy Commission

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Docket Number 15-AAER-02

Subject: Pool Pump Motors and Portable Electric Spas

Dear Madam/ Sirs,

I am responding to a recent request for costs associated with alternate or improved methods of insulating heated outdoor portable spas that rely on strong oxidizers for sanitation.

As indicated for the record submitted in Sacramento at the CEC on February 18, 2016, EPS foam/PVC vinyl spa covers have a steadily declining insulating value as condensation forms in the foam cores to make the core a thermal conductor. A silent energy thief, water heavy covers create a substantial burden to spa owners as inevitable saturation takes place to treble standby power costs. Rate payers struggle with water saturated covers (some 200 lbs.) then reluctantly start the costly cycle over by purchasing another EPS foam cover to the detriment of the planet. It might be as foolish to use foam core covers on heated outdoor spas as building homes on shifting sands.

Health as well as energy use should be primary considerations in regulation. Research shows the manufacturers of EPS and PVC strictly warn their products are incompatible with strong oxidizers such as those prevalent in spa water. Conventional foam/vinyl spa covers off-gas volatile organic compounds (VOCs™) during spa sanitation and considered a health danger if contacted or inhaled.

When considering regulations, it would seem prudent to recommend a highly visible, indelible disclaimer tag making MSDS warnings available to the unsuspecting public in view of VOC issues concerning EPS/PVC spa covers. That measure might help air quality boards avoid product liability issues should the foam spa cover business model remain a part of the spa industry.

Recommendations for insulating covers:

1. Materials must not constitute health hazard or contain VOCs™.
2. Cover insulates efficiently for minimum 7 years.
3. Minimum R-9 insulating value.
4. Bi-fold covers have tested/approved insulating hinge.
5. Pliable underside (padding) for efficient perimeter contact to upper acrylic edge.
6. Viable radiant barrier facing water.
7. Insulating components not contact heated water.

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EPS spa covers are abundantly available and spa owners are continually duped by misleading claims. Although unfamiliar with every alternative, we at Coverplay have yet to be presented with a tested, proven design as energy efficient as our Airframe spa cover. (Chambered air limiting conduction, convection amid radiant barriers) The Airframe spa cover was developed over a five year period using design elements recommended in the list above. After receiving a utility patent for those, "Late night" efforts with our 24/7 testing facility we are ready to share these innovations with the spa industry in the form of license agreements. We can provide turnkey operations and, "Kits" for \$198 with one day training seminars to as many dealers as necessary to help prevent EPS foam/ PVC vinyl from being used as energy wasting, toxic spa covers.

This project would:

Bring manufacturing jobs back to California. (400 sq. ft. of space using hand tools)

Create a sustainable cover that is recyclable and repairable. (Ecologically "Green")

Save energy year after year, not gaining water weight. (Conservation for CA power companies)

Prevent EPS foam/ PVC vinyl from entering landfills, wildlife habitats. (equal to 3520 Styrofoam cups per cover)

Dramatically reduce VOC health exposure to families with spas. (Benzene, styrene, polyvinyl chloride)

I enjoyed the opportunity to present my research findings at the CEC and thank you for that invitation and the invitation to be a member of the rule making committee regulating portable electric spas in California. Please feel free to contact me to discuss any of these opportunities I have described in this letter as I look forward to helping California and the nation further the cause of limiting the reckless use of Expanded PolyStyrene foam and PolyVinyl Chloride.

Sincerely,

E. Jess Tudor
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