

DOCKETED

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Spa Cover Efficiency

Additional submitted attachment is included below.



simply the worlds best spa cover !

U.S. Patent No. 9340989

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Docket Number 15-AAER-02

Subject: Portable Electric Spa Covers

Dear Madam/ Sirs,

I would like to thank the CEC members for the opportunity to expose the nature of EPS foam and its irresponsible use insulating outdoor spas on standby power. Test results in early 2010 for P.G. & E. revealed two year old, dual hinged EPS foam covers as conductive from water saturation. Some of those spas tested were using more than two times the allowable limit of power for compliance in California at that time. Without promoting a sustainable solution, those results and burgeoning landfills of styrene are likely to continue unabated for 35 more years!

Because new EPS foam covers have limited efficiency, consumers may be duped as their new spas increasing energy use exceeds the number on the accompanying CEC label. This sales tactic could be considered a deceptive business practice as most consumers consider CEC appliance accreditation to be reliable and consistent for the length of the product warranty.

A CEC ruling to exclude spa covers used on spas surely promotes a competition in sourcing cheaper spa covers at consumer's expense. Conversely consumers should have a right to know what chemicals and efficiencies are represented to encourage better/safer products to reach the marketplace to help protect family health, their budgets and the planet itself.

A plausible solution for attaining legitimate energy reductions and consumer protection from cheap, toxic spa covers can be simple. Just as important, manufacturers should remain obligated to CEC compliance for the length of their spa warranty.

The CEC rule would simply include the cover with the spa as a warranted unit, not separate. Consumers could then hold spa companies accountable when their cheap cover fails to insulate effectively as stated on the energy label when purchased. This truth in advertising would promote innovative alternatives and allow consumers to choose spas and covers more wisely. Aftermarket spa covers would be subject to the same criteria to help limit outrageous claims fueled by unscrupulous greed while misleading the public with deflecting warrantees.

OEM's could offer one year warrantees on their spas to coincide with the efficacy of some foam covers and seven to ten year warrantees for spas sold with the efficiencies of non-toxic cores such as the Airframe cover. This formula could increase demand for better spa covers (more energy efficient) by disclosing foam covers continual need to be replaced to maintain energy efficient compliance with the CEC.

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Included in my research were Material Safety Data Sheets for EPS foam and PVC vinyl expressly warning of the dangerous toxic health hazards of strong oxidizers (chlorine, ozone) in the presence of those chemical composites. Because of imminent exposure and the history of class action lawsuits upheld against other insulating materials (asbestos) I recommend a prominently displayed disclaimer to limit CEC liability in accordance with those MSDS warnings should foam covers still be preferred and promoted by some in the spa industry.

Sixty four California cities and government facilities have banned the use of EPS foam food and drink containers because of human and wildlife health concerns, San Francisco recently banned polystyrene products from the city and county effective January 1, 2017.

Ridding California of polystyrene spa covers is a sustainable future all can live with!

Recommendations for Insulating Covers:

1. Materials must not constitute health hazard or contain VOC's.
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 spa edge.
6. Viable radiant barrier facing water.
7. Insulating components not contact heated water.

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