

DOCKETED

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Reinstatement of Reference to ASTM D6083

Additional submitted attachment is included below.



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February 5, 2021

Docket Unit
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

Re: Docket Number 19-BSTSD-03
2022 Energy Code Pre-Rulemaking Express Terms

To Whom It May Concern:

By this letter, GAF is submitting a request to bring back the reference to ASTM D6083, "Standard Specification for Liquid Applied Acrylic Coating Used in Roofing" in the California Energy Commission's (CEC) Title 24, "California Building Standards Code," Part 6.

Founded in 1886, GAF is the leading roofing manufacturer in North America. As a member of the Standard Industries family of companies, GAF is part of the largest roofing and waterproofing business in the world. The company's products include a portfolio of roofing and waterproofing solutions for residential and commercial properties.

ASTM D6083 is the material standard for acrylic coatings and it was withdrawn from the ASTM standards books in 2015. As a result, the reference to this standard was removed from the 2019 Building Energy Efficiency Standards. However, ASTM D6083 has since been re-approved and we believe it is appropriate to reference it in the 2022 edition.

GAF proposes that Section 110.8-Mandatory Requirements for Insulation, Roofing Products and Radiant Barriers, page 35, be revised as follows:

- "4. Liquid applied roof coatings applied to low-sloped roofs in the field as the top surface of a roof covering shall:*
- A. Be applied across the entire roof surface to meet the dry mil thickness or coverage recommended by the coating manufacturer, taking into consideration the substrate on which the coating is applied; and*
 - B. Meet the minimum performance requirements listed in TABLE 110.8-C or the minimum performance requirements of ASTM C836, D3468, **D6083** or D6694, whichever are appropriate to the coating material."*

In closing, GAF appreciates the opportunity to submit a public comment. Please feel free to reach out to me for further assistance or clarification. I can be reached at 224/301-0549 or joan.crowe@gaf.com.

Respectfully submitted,

Joan P. Crowe, AIA
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GAF

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