

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 19, 2008

Dear Commercial Dishwasher Manufacturer or Other Interested Party,

The purpose of this letter is to put forth the attached amendment to the ENERGY STAR[®] Commercial Dishwasher specification (Version 1.1) that addresses models offering an optional manual rinse, explain the reasoning behind the amendment, and itemize several changes to the Qualifying Product Information (QPI) form. Please note, Partners **need not** re-qualify any currently ENERGY STAR qualified models in response to these changes.

Based on discussions with NSF International, allowing for an additional rinse after glasses are sanitized violates current FDA Food Code and NSF Standards. As written in the ENERGY STAR specification for commercial dishwashers, all qualifying models must be tested and certified to NSF/ANSI 3-2007. **As such, commercial dishwashers that incorporate an optional manual rinse following the sanitizing rinse are not eligible for ENERGY STAR qualification.**

The attached Version 1.1 specification has been revised to explicitly exclude commercial dishwashers that offer this feature. Should NSF International allow certification of additional rinse options in the future, EPA may revisit allowing these product types to qualify for ENERGY STAR assuming the water used during this additional rinse cycle is captured within the existing ENERGY STAR gallons per rack metric.

In response to this change, the QPI form has also been revised to include the following note: *Dishwashers that include a manual rinse after the final sanitizing rinse are not eligible for ENERGY STAR.* EPA has also received several questions over the last few months that indicate a need for further clarification regarding several other requirements listed on the QPI form. The following additional revisions have been made to Section IV: Testing Requirements in the attached Version 1.1 form:

- The reference to self-testing has been removed since the water consumption of all commercial dishwashers must be tested and certified by a third-party organization.
- The option to answer “no” to “NSF Certification” has been removed and text was added reminding manufacturers that ENERGY STAR requires certification to NSF/ANSI 3 for qualification.
- New fields have been added in Section IV requiring manufacturers to indicate the organization that tested the model using the relevant ASTM idle energy rate test method, as well as the date on which the model was tested.

Lastly, the statement previously added to Section III: Energy and Water Efficiency Performance of the QPI form clarifying that idle energy rate results should represent **tank heater** energy rate (as opposed to booster heater energy use) has also been added as a note under Table 1 of the Version 1.1 specification.

Stakeholders with additional questions regarding the Version 1.1 specification or QPI form can contact me at 202-343-9124 or schmeltz.rachel@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Rachel Schmeltz". The signature is written in a cursive style with a horizontal line above the first few letters.

Rachel Schmeltz, EPA
ENERGY STAR Program Manager
Climate Protection Partnerships Division