

**Steering Committee for Water Efficient Products
1001 Connecticut Avenue, NW Suite 801
Washington, DC 20036**

March 7, 2005

Ms. Rachel Schmeltz
Energy Star Program Manager
Office of Air & Radiation
US Environmental Protection Agency
Washington, D.C. 20460

Re: Pre-Rinse Spray Valve Specification

Dear Ms. Schmeltz:

We co-chair a steering committee formed from over one hundred organizations, companies, and water utilities that support a voluntary water-efficient product labeling program to be administered by the U.S. Environmental Protection Agency (EPA). Thank you for the opportunity to provide feedback on the Draft Specification for Pre-rinse Spray Valves.

Pre-rinse spray valves offer an exciting opportunity for energy and water savings. However, we encourage Energy Star not to rush the specification process. The proposed date of September 2005 for the announcement of a final specification may prove to be premature.

Special attention should be given to examining user satisfaction and the product life of spray valves over a range of specification flow rates (GPM). The lab specifications for testing cleanability outlined in the ASTM Standard may not fully represent "real world" food service applications of these products. Adding additional seconds per plate for cleaning would force the food service industry to trade-off the cost of their labor against the value of energy and water savings. We are also aware that concerns have been raised regarding the replicability, and therefore the reliability, of the cleanability test method. We hope you share our concern that Energy Star products should not compromise existing levels of user satisfaction and product life in an attempt to maximize energy and water savings.

More analysis may show the benefits of a slightly less aggressive specification for pre-rinse spray valves initially, which, over time, could be followed by periodic review for tightening of the specification as technology advances. Additionally, in preparation for a Tier 2 specification, EPA may want to explore with stakeholders the potential for product designs that obviate the need for a spray handle clip, which allows the valve to run continuously. For example, valve designs that maintain flow with little or no additional gripping pressure may be ergonomically acceptable and

eliminate the need for a valve clip. However, care should always be taken to ensure that efficiency innovations not interfere with user satisfaction or create new barriers to user acceptance.

We believe that the approaches outlined here are consistent with the development of other Energy Star product specifications, and would reduce the potential for unwelcome consequences that might result from the release of a spray valve specification that has not been fully scrutinized.

Sincerely,



**Peter DeMarco, Co-Chair
Chair**

American Standard
(732) 980-3472



Al Dietemann, Co-

Seattle Public Utilities
(206) 684-5881

e-mailed to: Mehernaz Polad, ICF Consulting, mpolad@icfconsulting.com
Rachel Schmeltz, EPA, schmeltz.rachel@epamail.epa.gov
James Hanlon, Water Office, EPA, hanlon.jim@epamail.epa.gov

March 2005

Steering Committee for Water Efficient Products

American Standard, Inc.

Association of Metropolitan Water Agencies

City of Austin TX

California Urban Water Conservation Council

East Bay Municipal Utility District (CA)

Eugene (OR) Water & Electric Board

Friends of the Earth

City of Houston

Irrrometer Co., Inc.

Kohler Company

Maytag Corporation

National Association of Home Builders

Natural Resources Defense Council

Office of the New Mexico State Engineer