

May 20, 2010

Ms. Kathleen G. Vokes
U.S. Environmental Protection Agency
Climate Protection Partnership Division
ENERGY STAR Program
1200 Pennsylvania Ave. NW.
Washington, DC 20460

Reference: Action Items from May 14 Meeting

Subject: NAFEM Proposal for Verification Program – Equipment Design

Dear Ms. Vokes,

NAFEM members have developed a proposed method to verify ongoing production of existing ENERGY STAR qualified food service equipment. This proposed method will ensure products continue to meet the ENERGY STAR qualification criteria without placing an unnecessary burden on manufacturers. This method leverages the long established model used by third-party certification bodies for safety and sanitation requirements.

Background – The method used by Underwriters Laboratories Inc. is well documented on their web site: <http://www.ul.com/global/eng/pages/offerings/services/globalfieldservices/fus/>
A brief summary is as follows:

UL Representatives audit a manufacturer periodically to make sure that a product continues to be manufactured the same way it was manufactured when it obtained UL certification. Audits may also include verification of required factory test programs, witnessing of tests required by the certification standard and verification that required test equipment is in compliance with the standard. Factory inspections are unannounced and are conducted on a periodic basis, typically 4 times annually. The UL Representative typically checks random samples of the customer's current production against the product description (Follow-Up Service Procedure) written by the engineer who originally evaluated the product. If the product contains materials that are not readily identifiable, UL may conduct sample testing.

ENERGY STAR Documentation Report – Using the example set by UL, we have created a draft descriptive report that documents the details of components critical to the energy and water consumption of a representative appliance. A draft of this document is attached. The intent is that the third party certification organization that is currently performing periodic inspections for safety standards at the equipment manufacturer's facilities would use this document to perform the ENERGY STAR audit. If a discrepancy is found, a variance is submitted to EPA with a request for corrective action within a given time period. Failure to adequately address the non-conformance would result in de-qualification of the product.

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NAFEM Proposal

We sincerely hope you will consider this proposal as an adequate means of meeting the objective of maintaining the integrity of the ENERGY STAR brand. If you have any questions regarding this information, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Joel F. Hipp". The signature is written in a cursive style with a large initial "J" and "H".

Joel F. Hipp
Agency Approval Engineer
Warewash Division
(937) 332-2836

copies to:
Charlie Souhrada, NAFEM
File – NAFEM Equipment design verification proposal