July 1, 2005

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

Re: Final Draft - Pre-Rinse Spray Valve Specification

Dear Ms. Schmeltz:

Thank you, again, for the opportunity to offer comments on your proposed initiative on Pre-Rinse Spray Valves. As I noted in our letter of March 7, the California Urban Water Conservation Council has been a leader in introducing the water and energy-efficient pre-rinse spray valve (PRSV) to the food service industry. Our program, Rinse & Save, has just exceeded 30,000 installs in California, representing 30 percent of all of the PRSV hot water installations in our state.

There are three areas of concern with the latest release that we wish to point out to you. They are as follows:

1) Partner Commitments, page 2: A note on this page states that NAFEM may be the source of "pre-rinse spray valve data". Furthermore, in earlier correspondence you also indicated that the introduction of the Energy Star specification would be done at or through NAFEM. NAFEM is NOT the organization nor the venue from which to secure PRSV data. The PRSV is not an item of "equipment", but rather a plumbing fitting. As such, the manufacturers of PRSVs are members of the Plumbing Manufacturers Institute (PMI). That organization would be the industry source for additional data and would be the correct venue through which to introduce the specification.
2) Final Draft Eligibility Criteria, Page 2: A note on this page under "Water Pressure and Temperature" suggests that the EPA will "educate users to turn down their valve or tap" to deal with excessive flows resulting from high pressure. This recommendation would be contrary to the recommendations and practices suggested by the plumbing industry, in particular, the manufacturer of shut-off valves. To throttle back a shut-off valve to a partially open position results in excessive turbulence in the valve and causes unnecessary wear on the valve seat. The consequence of this is that when the user goes to completely close the valve, it will leak due to this wear. We strongly urge the EPA to eliminate this from any recommendations to end-users.

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3) Final Draft Eligibility Criteria, new item: The specification must include the requirement that the PRSV comply with the national plumbing standard ANSI/ASME A112.18.1-2003 as covered in the attached Rinse & Save PRSV specification. Without this requirement being satisfied, the PRSV cannot be installed and be in compliance with the applicable plumbing codes. If such a PRSV were installed without the ANSI certification noted on the unit, the restaurant could be red-tagged by a plumbing inspector and, as a result, be closed until such time as a compliant PRSV was installed. This has the potential of seriously damaging the Energy Star image in the view of food service operators.

We continue to urge that your office maintain a close coordination with the EPA Office of Water to ensure that their concerns are considered. The water community pioneered the work with this pre-rinse spray valve, and the water community's role in its labeling should be respected.

Sincerely yours,

Mary Ann Dickinson
Executive Director

JK:mj

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Attachment: Rinse & Save PRSV Specification, Version 2.0-2004