

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:

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, is responsible for over 20,000 retrofits of these valves in California since 2002. This represents 20 percent of all of the PRSV hot water installations in our state. Our current program and others in California will result in over half of the 102,000 PRSVs replaced by the end of this year. Finally, based on the success and field experience in this retrofit program, the California Energy Commission (CEC) adopted a regulatory maximum standard of 1.6 gpm for all PRSVs sold in the State of California beginning in January, 2006.

An early component of the Rinse & Save Program was to develop a performance specification that brought the greatest possible water and energy savings to the food service sector without sacrificing field performance. In conjunction with the Pacific Gas and Electric's Food Service Technology Center in San Ramon CA, we developed a specification in 2002 that remains relatively intact today. The PRSVs of three manufacturers completed the required testing and qualified for our Program. Furthermore, that specification formed the foundation for the PRSV regulation eventually adopted by the CEC in 2004. It also led directly to the adoption of Standard Test Method F2324-02 by the American Society of Testing and Materials.

The current proposal by your office mirrors our specification. As you know, one element of that specification is that of cleanability. Some have asserted that the cleanability requirement is unnecessary in such a specification, instead "letting the marketplace decide." We disagree. We have found that the cleanability requirement (whether it is 21 seconds as we require, or 26 seconds as you propose, or 30 seconds as the CEC specifies) is absolutely essential and provides the appropriate performance discrimination when evaluating these products. As noted above, already three manufacturers produce PRSVs that comply with the cleanability specification. We concur that such a requirement must be included here.

It is interesting to note that when the CEC sought public testimony on the proposed adoption of the statewide regulation (which included cleanability), the plumbing



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industry was represented by a single manufacturer (T&S Brass), who testified in support of the regulation.

Another area of some discussion is whether or not an efficient PRSV may be equipped with a spray handle clip. Our Rinse & Save specification does not prohibit such clips. Based upon our experience in over 20,000 establishments, we believe that these clips are necessary for applications where the operators are at their stations for long periods and where the physical demands of actuating the valve are therefore significant. We support the definition as shown in Section 1A.

We do, however, have a concern over the tiering proposed in the Energy Star specification in Section 3. The water industry strongly supports tiers, but on a concurrent or parallel basis wherein multiple tiers are available for products of varying efficiency levels. As such, we oppose the serial adoption of tiers as proposed and instead recommend that multiple tiers be established at the following flow rates: 1.4-gpm, 1.6-gpm, and 2.0-gpm.

Thank you for the opportunity to comment on the Energy Star proposed specification. We urge 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