

**Champion Industries Comments on ENERGY STAR Commercial Dishwashers
Specification Draft #2**

I just have a couple of questions about the requirements. For the most part combined with the ASTM procedures they are self explanatory. However on the two tank rack machine, it is a bit cloudy what it is we are measuring. The Efficiency requirements on the table you provided have the same idle energy rate for the single tank as the two tank unit. That combined with the test information lead me to think we are only measuring the idle energy usage of the wash tank. Is this your intent? I have to admit that I have not run an idle energy consumption test on my two tank rack machine, but I would think that with the increased surface area of two tanks and the higher temperatures required in the power rinse tank that the combined idle energy of the two of them would be almost double to that of a single tank machine. I also did make the assumption that the idle energy rate does not include booster energy.

On your idle energy test data sets:

On single tank rack machines, data point 1, 3, and 11 are invalid test as defined by the test "The wash tank temperature must not fall below the nameplate minimum temperature at any time during the idle energy rate test." NSF minimum single Tank Conveyor Temperature is 160 F. I think this will be a common mistake especially as the standard goes forward, as many of the low temp units do not have a maintenance heater, therefore they will not maintain working temperature.

I also noticed a lot of comments regarding defining what a single and what a 2 tank machine is or has. As these machines are available in many different configurations, as not to limit the machines based on one manufacturer or another, wouldn't it be best to use the NSF-3 Definitions of the product. The units are categorized for water consumption and cleanability already by NSF and all manufactures are already complying with the definitions. To use a different definition may have a machine categorized as a single tank for water consumption but as a multiple tank machine for idle energy. The definitions can be found in NSF-3 chapter 1 Section 3.23 (multiple tank conveyor) and section 3.36 (single tank conveyor). These definitions eliminate everyone's opinion and put the definition back on a recognized and established standard.

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