

**ENERGY STAR Commercial Dishwasher Industry Stakeholder Meeting
National Restaurant Association Show, Chicago, IL
May 21, 2007**

Meeting Notes

Over 20 commercial dishwasher manufacturers and other industry stakeholders convened to discuss the Draft 2 ENERGY STAR Commercial Dishwashers Specification at the National Restaurant Association (NRA) Show in Chicago, IL on May 21, 2007. The purpose of the meeting was two-fold: (1) to provide stakeholders an opportunity to ask questions about EPA's proposed changes to the Draft 2 and help to address any remaining questions or concerns and (2) to provide an overview of ENERGY STAR commercial foodservice marketing initiatives and opportunities in preparation for the October NAFEM launch.

Please refer to the Final Attendee List for the names of the individuals who participated in the meeting. Provided below is a summary of the meeting discussions and presentations.

Draft 2 Specification Discussion: *Rebecca Duff, ICF International and David Zabrowski, Fisher Nickel, Inc.*

A comment response document was distributed to stakeholders prior to the NRA show that served as a guide for the discussion. This document included a list of key comments submitted by industry stakeholders in response to the Draft 2 specification and EPA's rationale for proposing changes or retaining existing requirements. The meeting focused on the following key proposed changes and items open for discussion. **Note:** More details can be found in the comment response document available at www.energystar.gov/productdevelopment.

1) Undercounter Machine Definition

Question to Stakeholders: Because NSF does not provide a definition for undercounter machines, should there be a maximum height or other requirement to differentiate undercounter machines in the specification? Due to the fact that undercounter machines are allowed a higher water consumption it is important to be able to draw a clear distinction between these and other machines.

Stakeholder Comment: Standard worktop kitchen height is between 36 and 38 inches. A machine height of 38 inches is sufficient as that is the maximum height that will fit behind a bar.

Stakeholder Comment: Work height for some machines is up to 42 inches high, so 42 inches may be a better proxy.

Stakeholder Comment: Load-type is not sufficient for defining machines.

Question to Stakeholders: Should stand height be accounted for in setting the height of machines in the specification?

Stakeholder Comment: The machine would still be listed at whatever height the actual machine is not considering any stand, so it is not necessary to account for stand heights. A maximum height of 38 inches should be sufficient.

EPA will consider these comments in the Final Draft specification.

2) Multiple Tank Conveyor Definition

Question to Stakeholders: Does EPA need to identify a specific number of tanks in the multiple tank conveyor definition? EPA would like the specification to exclude flight type machines but also wants to ensure that it remains open to all other multiple tank machines to be able to qualify.

Stakeholder Comment: The NSF definition of multiple tank conveyors is clear and should be used, with a few modifications, instead of EPA's proposed definition in the Comment Response Document.

Stakeholder Comment: The NSF definition of multiple tank conveyors does not define the number of tanks. If you take auxiliary rinse out of the definition, it may leave room for some loopholes in the definition.

Stakeholder Comment: It comes down to whether or not the machine has separate wash and rinse tanks. The pre-wash tank should not be included in determining whether a machine is single or multiple tank.

EPA will consider these comments in the Final Draft specification.

3) NSF/ANSI 3-2003 Certification

Question to Stakeholders: EPA does not want to exclude other testing organizations by requiring NSF listing of qualifying products. However, EPA does agree with requiring certification to NSF/ANSI 3-2003 for qualification. Are there any concerns with adding an NSF certification requirement to the specification?

Stakeholder Comment: Other laboratory listings (i.e., ETL) do not publish water consumption data so they would be insufficient. How would EPA know that a machine is certified to NSF if the data is not listed?

ENERGY STAR Response: ENERGY STAR is a self-policing, self-reporting program. Manufacturers will need to report product performance using a Qualified Product Information (QPI) form. If the model is not listed in the NSF database then we will ask for additional data, such as gallons per rack, etc., so that we can check the numbers. There is some due diligence on behalf of ENERGY STAR to ensure that the numbers being reported match that which is

made available to EPA via third party listings or other sources. However, it is also up to the program partners to protect the integrity of the ENERGY STAR brand by reporting anyone who is in violation of the specification requirements and/or their agreement with EPA. We have seen this work especially well in markets where there is intense competition like the commercial dishwasher market.

Stakeholder Comment: As long as machines meet the NSF/ANSI standards, this should be adequate to ensuring that performance is not compromised.

4) Door Type, Low-Temperature GPR Level

Question to Stakeholders: In response to a stakeholder comment, EPA revisited the dataset for low temperature single tank door type machines and found that the top 25% of performers is better represented by a level of 1.18 GPR. The new dataset now represents those models currently for sale in the marketplace. Do stakeholders have any concerns with this proposed change?

No Stakeholder Comment.

5) Multiple Tank Idle Energy Rate

Question to Stakeholders: In response to several comments, EPA revisited the idle data submitted by manufacturers for multiple tank machines and found that some of the data points were not representative of the heat energy being used by both the wash and rinse tank. Based on this new information, EPA is considering a maximum idle energy rate of 2.6 kW for multiple tank high temperature models and 2.0 kW for low temperature models. Do stakeholders have any concerns with this proposed change?

No Stakeholder Comment.

6) Guidance on Rack Length in Conveyor GPR Calculations

Question for Stakeholders: Stakeholders felt that additional guidance should be provided for rack length to ensure consistency in reporting. EPA is proposing a requirement that manufacturers must use a 20x20 rack length when calculating GPR for ENERGY STAR qualification. Do stakeholders have any concerns with this proposed change?

No Stakeholder Comment.

7) Guidance on Rounding GPR Values

Question for Stakeholders: EPA is proposing that GPR should be reported with three significant digits and idle energy rate be reported to two significant digits. Conventional rules for rounding should also be followed. Do stakeholders have any concerns with this proposed change?

No Stakeholder Comment.

EPA Timeline

A timeline was shared with attendees that included a release of the Final Draft in early to mid-June. Stakeholders will then have a two-week comment period. Release of the final specification is targeted for early July, at which point manufacturers can begin signing on as Partners and submitting models for qualification. However, Partners will not be able to label or promote qualifying models until the effective date, which is October 11, 2007. The specification will be officially launched at the NAFEM show in Atlanta October, 2007.

ENERGY STAR in Commercial Food Service: *Kate Lewis, U.S. EPA ENERGY STAR CFS Marketing Team*

Ms. Lewis initiated a discussion with manufacturers to determine ways in which EPA can incorporate commercial dishwashers into larger efforts to promote ENERGY STAR qualified equipment at NAFEM and beyond. Specifically, Ms. Lewis provided stakeholders with an overview of the ENERGY STAR Labeled Products program, presented EPA's strategy and goals for this sector, and shared a list of target market actors and how EPA is currently working in these channels to promote ENERGY STAR.

Afroz Khan, Consortium for Energy Efficiency (CEE), also relayed the interest of her members in offering incentive programs from ENERGY STAR qualified commercial dishwashers once the specification is finalized.

Stakeholders can review Ms. Lewis' presentation on the ENERGY STAR Web site. The attendee list and related documents can also be downloaded from: www.energystar.gov/index.cfm?c=new_specs.comm_dishwashers.

Meeting adjourned.