

Dear Rachel,

Thank you for your February 7, 2005 letter asking for comments on your Draft 1 Version 1.0 specification for Energy Star qualified pre-rinse spray valves.

We are very pleased that you are adding these devices to your extensive Energy Star program and that you decided to include the cleanability test.

I have only two very minor suggestions for improvement of the document entitled "Draft 1 Eligibility Criteria."

1. Change the first sentence of the definition of "pre-rinse spray valve" to read:
"A hand-held device that uses a spray of water to remove food waste from dishes prior to cleaning in a commercial dishwasher."

These valves are only used with commercial dishwashers.

2. Change the criteria for the Cleanability Test in Tables 1 and 2 from 26 seconds a plate to 30 seconds per plate. We originally proposed that the California mandatory standard be set at 26 seconds per plate. After receiving comments from some manufacturers that the cleanability test was not very precise, I conducted it myself at the PG&E Food Service Technology Center and confirmed that the flow rate test is very precise but the cleanability test is less precise. We therefore increased the tolerance for the cleanability test by setting the standard at 30 seconds per plate.

I am satisfied that this 30 seconds per plate standard adequately separates low-flow units that clean adequately from low-flow units that do not clean adequately.

Call me if you have any questions.

Michael

R Michael Martin
California Energy Commission