

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



June 26, 2013

OFFICE OF
AIR AND RADIATION

Dear ENERGY STAR[®] Commercial Griddle Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) has recently learned of challenges associated with using the ASTM test methods specified under ENERGY STAR Version 1.1 Commercial Griddles requirements that lead to potentially wide variability in certification and verification test results for commercial griddles. As a result of these challenges, which are summarized below, EPA is proposing to amend the commercial griddle specification to eliminate the cooking-energy efficiency requirement on an interim basis, while retaining the normalized idle energy rate requirement as the basis for qualifying for ENERGY STAR certification.

Background: ASTM Cooking-Energy Efficiency Test Product Variability

During a recent ASTM F26 Committee meeting held on May 21, 2013 in Chicago, IL, members discussed concerns related to an inconsistent supply of the frozen hamburger patty test product cited in the existing ASTM test method for griddles. The ASTM F1275-03 *Standard Test Method for the Performance of Griddles* and the ASTM F1605-95 (2007) *Standard Test Method for the Performance of Double-Sided Griddles* specify several frozen hamburger patty requirements. The specific requirement in question is the fat content, which is currently $20 \pm 2\%$ fat by weight, for each patty. According to various laboratory representatives and griddle manufacturers throughout the country, meat purveyors are unable to consistently supply patties that meet this specification requirement, and as a result, the fat content measured is ranging from 10-30%. Preliminary data collected by PG&E's Food Service Technology Center suggests a wide variance in cooking-energy efficiency results based on this variable test media. Based on these results, EPA shares stakeholder concerns regarding the potential impacts on ENERGY STAR certification and verification processes.

Amended Version 1.2 Specification

Absent viable test material, EPA is removing cooking-energy efficiency requirements from the ENERGY STAR specification for commercial griddles. While the ASTM F26 Committee continues its diligent efforts toward identifying a solution, qualification will be based on current normalized idle energy rates. The amended Version 1.2 specification also includes a cooking-energy efficiency reporting requirement, using the current ASTM test methods which, along with the fat and moisture content (%) of the test product, will be used by EPA for research and evaluation purposes and will not be posted on the ENERGY STAR Qualified Product List. The following note has been added under *Table 3: Test Methods for ENERGY STAR Qualification* to avoid any delays in certification testing due to test product failing to meet the ASTM test product requirement:

When conducting the cooking energy efficiency test, EPA recognizes that laboratories shall strive to obtain a test product that meets the specification for fat content outlined in ASTM F1275-03: Standard Test Method for the Performance of Griddles (Section 7.1) and ASTM F1605-95 (2007): Standard Test Method for the Performance of Double-Sided Griddles (Section 7.4). However, if the test product fat content measurement falls outside of the prescribed tolerance, testing shall continue and the measured value shall be reported.

Impact on ENERGY STAR Verification Testing

Effective immediately, all verification testing for commercial griddles will follow the approach outlined in Version 1.2 of the specification. Note that this also applies to current testing for commercial griddles

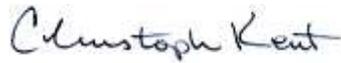
where testing has not been completed. Per the Version 1.2 changes, certification bodies (CBs) will report cooking-energy efficiency and fat and moisture content (%) of the test product for certification as well as verification testing.

ASTM Committee Revision Process

EPA is closely following efforts by the ASTM F26 Committee to revise these test methods and encourages all stakeholders to participate in the development process. Individuals interested in contributing to ASTM efforts can contact David Zabrowski, Fisher Nickel, Inc., at (925) 866-5614 or dzabrowski@fishnick.com. EPA anticipates updating this specification with the revised version of ASTM F1605 when it is complete and plans to reinstate the cooking efficiency requirement for ENERGY STAR certification and verification at that time.

EPA intends to finalize the amended Version 1.2 Commercial Griddle specification by July 26. If you have comments or questions, please contact me at (202) 343-9046 and kent.christopher@epa.gov or Adam Spitz, ICF International, at (202) 862-1226 and adam.spitz@icfi.com.

Sincerely,



Christopher Kent,
Product Manager
ENERGY STAR Commercial Food Service Products