



12700 Knott Street
Garden Grove, CA 92841
Phone: 800-854-6417; 714-898-8781, x226
Fax: 714-895-2141

18 January 2011

Energy Star Representative
commercialdishwashers@energystar.gov

Subject: CMA Machine Types Currently covered by Energy Star: High-Temp and Low-Temp Undercounters, Single-tank Door-type, and Multi-tank Conveyors

Dear Project Administrator:

CMA appreciates how the EPA and its Energy Star Program is beneficial in providing the end-users with environmental intelligence data to help them choose energy efficient commercial dishwashers. As a manufacturer, CMA has become very concerned with the constant drive to push **energy and water levels to extreme lows**. In our professional experience, it takes a certain amount of water and energy to produce proper pressures and heat to wash and sanitize dishes. There are many types of restaurants, food cultures, and environmental conditions; we believe there should be some "wobble-room" to deal with light, medium and heavy soil conditions. The emphasis for lower water and energy usage seems to provide very little "wobble-room" when dealing with *less than* ideal conditions.

As the Energy Star bar is raised, the more difficult it is to make-up for operator error and facility deficiencies. There is a point when, unless all the conditions are perfect (**pre-rinsing, chemicals, water pressure, clean spray arms, clean screens, racking dishes, etc**), the dishwasher can become a health liability if not operating properly. The industry has come a long way over the years at eliminating operator error by incorporating automatic controls wherever possible, however, the subject above is still controlled by the person operating the machine and can be the difference between clean or dirty dishes.

We believe a dishmachine can operate at the "New Proposed" Energy Star levels in a perfect setting, but unfortunately most dishmachines are in "real world settings" where the warewashing operation is only as good as the employee operating the machine.

CMA has just completed a costly and time-consuming, two-year process of engineering its dishmachines to meet Energy Star levels for approval. The newly proposed Version 2 will disqualify (7) seven CMA models, which is very disappointing and we believe unfair. Yes, we can look into additional ways to meet the new standards, and spend thousands of dollars in re-testing, but our first responsibility and priority is to be a good industry steward, and consider the health risk if one's equipment is not cleaning properly.

It is CMA's opinion that the "Idle Energy" and "Water Levels", as previously established, should remain the same. If qualification standards are raised, by lowering the idle energy and water usage, equipment performance and results would be at risk. The ideal solution would be to continue to save energy and water, with virtually no change in results. CMA believes that if the "Newly Proposed" Energy Star levels are approved, results and performance will be compromised, possibly leading to poorly sanitized dishes and defeating the optimum goal for all concerned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Belleville', written over a horizontal line.

Mike Belleville (mike.belleville@cmadishmachines.com)
Vice President of Operations

cc: Craig Miller, President; Dave Hart, VP (SSF); Fred Palmer, President (CMA)