



InterMetro Industries Corp.
651 North Washington Street
Wilkes-Barre, PA 18705-0557
USA

T (570) 706-3121

July 8, 2010

InterMetro Industries appreciates the opportunity to comment on the EPA “Draft 3 Version 2.0 Energy Star Commercial Hot Food Holding (HFHC) Specifications.” We have the following comments on the key issues:

- Large Banquet Cabinets: If insufficient data has been received regarding cabinets larger than 55 cubic feet, do not exclude them, nor add a fourth category, but keep the existing slope.
- Testing and Qualification of Families: We agree with separate testing for differences in cabinet size within any given model family, while allowing flexibility regarding the model variations represented by the tested unit (i.e. several door options, etc.). If some of the options would result in a slightly different idle energy rate, the manufacturer would test and qualify the most consumptive (i.e., worst case) configuration that would then represent all of the same size units within that model family.
- Adoption of new ASTM F2140 Test Standard: We agree with the repositioning of the thermocouples to match NSF/ANSI Standard 4 testing requirements. We disagree with unilaterally changing the test period from 3 to 24 hours. A 24-hour test means running a heater overnight unattended – something many labs may prefer not to do from a safety/fire issue. Metro suggests running the test for 3 hours or a minimum of 10 cycles, whichever is greater. Once the cabinet temperature has stabilized, 10 cycles should be adequate for accurate data.

Regarding the minor changes:

- References to “glass” doors have been changed to “transparent” doors to be more inclusive since a variety of transparent materials are used to provide viewing: InterMetro Industries agrees.
- Hot food holding cabinets that also provide proofing are explicitly excluded from the specification (i.e., dual function equipment): InterMetro Industries believes cabinets should not be excluded because they are dual function equipment; but be tested to F2140 in the hot food holding mode. If the cabinet passes in the holding mode, it will pass in the proofing mode because the ASTM F2140 holding temperature of 150°F is much higher than the temperature for proofing (90-100°F).
- Third party certification to ANSI/NSF Standard 4 *International Standard for Commercial Cooking, Rethermalization, and Powered Hot Food Holding Transport Equipment* and ANSI/UL Standard 197 *Commercial Electric Cooking Appliances* is now required to ensure that only commercial grade cabinets qualify for ENERGY STAR: InterMetro Industries agrees.

Regarding the “Energy Efficiency Criteria” for HFHC, the EPA has previously stated it “does not think weighting the data set based on sales volume is necessary as long as the percentages of available models that meet the proposed requirements represent the top quartile of *available models* within each of the volume subcategories.” InterMetro Industries believes the new criteria is wrongly influenced by test data from a few models which historically have very low sales volume (for a variety of reasons) and will make commercial kitchen operators purchase equipment which is not Energy Star qualified rather than purchase qualified equipment they cannot or do not want to use.

Sincerely,

Willard Sickles, P.E.
Manager, Product Safety and Compliance Engineering

James Dube
Product Manager, Foodservice Division

