

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



OFFICE OF  
AIR AND RADIATION

June 16, 2010

Dear Hot Food Holding Cabinet Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 3 Version 2.0 ENERGY STAR® Commercial Hot Food Holding Cabinet (HFHC) specification. Stakeholders are encouraged to submit comments on this proposal to EPA no later than **July 14, 2010**.

Based on stakeholder comments on the previous Draft 2 proposal and manufacturer discussions during the National Restaurant Association (NRA) Show in May, EPA decided to release a Draft 3 in lieu of a Final Draft to address the following key remaining issues:

- **Large Banquet Carts (> 55 cubic feet).** EPA has received minimal data on banquet carts larger than 55 cubic feet and sees three options for addressing this unique set of products:
  - (1) Exclude cabinets larger than 55 cubic feet;
  - (2) Add a fourth subcategory ( $\geq$  55 cubic feet) that caps the Idle energy rate at 380 watts; or
  - (3) Keep the existing slope as initially proposed in the Draft 2 version.

Stakeholders are encouraged to share additional data with EPA for these products in addition to providing comments on the options proposed above.

- **Testing and Qualification of Families.** Manufacturers continue to express concerns with the new requirement to test and report each individual model variation. In many cases, these variations may have minimal impact on the energy performance but to test and report each possible variation would greatly expand the Qualified Product List to an unmanageable length. EPA has been asked by several manufacturers to develop a more flexible approach to unit testing and qualification that preserves EPA's goal of providing the end user with more accurate and comparable data across product sizes while minimizing the burden on companies participating in the program.
- **Adoption of new ASTM Test Standard.** EPA is considering referencing a more recent version of the ASTM F2140 test standard currently being developed by the ASTM F26 Committee. Manufacturers are encouraged to review the latest proposed changes to the test method and comment on whether EPA should adopt this more recent version.

Stakeholders are encouraged to provide suggestions and feedback on these outstanding issues. In addition, the following minor changes have been made to the specification:

- 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.
- Hot food holding cabinets that also provide proofing are explicitly excluded from the specification (i.e., dual function equipment).
- 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.
- The effective date has been revised to May 2, 2011 due to the extended draft development process.

More details regarding EPA's rationale for making these changes are included in note boxes inserted throughout the document.

### **Testing and Verification Requirements**

EPA has included some preliminary language in the Partner Commitments section that reflects the current proposed language in the draft requirements for laboratory and certification bodies. Stakeholders are encouraged to provide suggestions and feedback on the proposed language.

### **Submittal of Written Comments**

Stakeholders are encouraged to submit written comments on this Draft 3 document for EPA consideration to [commercialfoodservice@icfi.com](mailto:commercialfoodservice@icfi.com) by **July 14, 2010** to be considered in the subsequent Final Draft document. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests otherwise.

To track EPA's progress in revising the ENERGY STAR Commercial HFHC specification, visit the Product Development Web site at [www.energystar.gov/revisedspecs](http://www.energystar.gov/revisedspecs). All specification development materials, including the latest Version 2.0 dataset, are posted to this Web page.

Thank you for taking the time to review this draft specification. Please feel free to contact me directly with any questions or concerns at (202) 343-9046 or via e-mail at [kent.christopher@epa.gov](mailto:kent.christopher@epa.gov) or Rebecca Duff, ICF International, at (202) 862-1266 or [rduff@icfi.com](mailto:rduff@icfi.com).

Sincerely,

A handwritten signature in blue ink that reads "Christopher Kent". The signature is written in a cursive, flowing style.

Christopher Kent, U.S. EPA  
ENERGY STAR Product Specification Development