

Comments on EPA Draft Eligibility Requirements for Refrigerated Beverage Vending Machines:

1C – Low Power Mode – The definition is not precise enough to be implementable. It claims that a low power state is one which operates “without jeopardizing its ability to keep vend product cool and return to full operational mode when required by the host site.” Since no parameters for this operation, or return from this state, are supplied, one could easily meet this specification by simply unplugging the machine.

3B – Low Power Mode – allowing product temperature to rise and then not specify how and in what time frame it must return to acceptable temperature seems of little value. Again, the machine can simply be unplugged. Allowing Aspartame products to cycle will cause them to degrade. In addition, a 50 degree product is deemed by the suppliers as unacceptable temperature wise, so how would one prevent a customer from purchasing such a product (i.e. a roving security guard after the facility has closed). Finally, making the feature site adjustable ensures that the feature will almost never be used due to the dynamics of the vending business. The personnel that place the machines do not open them or program them. In order to set site specific controls, a machine technician would need to be specially dispatched to program and enable these features. This is not likely to happen given the cost of such a service call to the machine supplier, who in fact does not pay the electricity bill for the machine’s operation. Finally, when the machine is swapped out for repair, another special technician trip would be needed to set site adjustable controls. Finally, the customer who actually pays the utility bill will have no way to verify the settings of such controls.

I highly suggest that the whole concept of site adjustable controls be removed. In addition, the description of a “Low Power Mode” without detailing how it operates, how one would test it, and how one would ensure that it is in fact operating correctly, seems to be of dubious value. In fact, efficiency standards should be set for the machine, and how a manufacturer meets them is left to their engineering skills.

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