



CREATIVE LAUNDRY SYSTEMS, Inc.

May 25, 2010

Ms. Katherine Kaplan
Energy Star Product Development
US Environmental Protection Agency
Washington, DC 20460

Dear Sirs:

Creative Laundry is one the largest distributors of the combination washer/dryers to the multi-family market in the United States. We request that you reconsider your decision to remove them from the Energy Star program. The use of the optional dryer function has not been incorporated in the energy and water measurements and there are no existing tests for such performance. This request is based on four factors.

1. Standards must apply only to the function rated. The overall efficiency of the washer is unaffected by any other function the machine performs. The current Energy Star rating uses washer water and power usage only. It should stand on its own merits. UL took this approach in listing and labeling both the clothes washer and the condensing dryer separately.
2. Standards must be consistent. Until a Final Rule prescribing new efficiency standards for residential clothes dryers is released as expected in 2011, interim waivers should be allowed to reduce economic hardship experienced by the manufacturers and suppliers. This will have the additional benefit of allowing new technologies which could potentially improve the energy efficiency to be implemented.
3. Standards must be logical. Removing an energy efficient appliance from the Program due to lack of recognized test procedures for an optional function of that device, rather than clarifying the label until such time as an appropriate test is developed restricts the savings these clothes washers provide.
4. Standards should encourage the development of more efficient technology. The University of Iowa has grant funding to develop a new clothes dryer to minimize the infiltration of unconditioned outside air, to reduce thermal pollution from dryer exhausting of lint-filled hot, moist air and to improve performance in drying the clothes in the drum.

FUNCTION: Mechanically, the LG washer model shown below and the matching combination model share the same internal parts. The LG WM3455 combo has an overall rating of 1.96 MEF and WF of 5.2. The companion clothes washer, WM1333, has a MEF of 1.96 and a WF of 5.8. In this case, the combo, which would be excluded, has a higher rating than the acceptable washer.

UNIFORMITY: Almost all Energy Star rated clothes washers are horizontal axis. These washers are essentially a drum which tumbles clothes through water. A dryer is a drum that tumbles clothes through hot air. A combination washer/dryer does exactly the same thing, but eliminates one of the drums, motor, cabinet and redundant controls. The EPA position allows the washer and separate, unrated, dryer if they have separate controls. It penalizes the manufacturers of combination machines who eliminate the duplication of common mechanical components. The lower energy draw saves energy and reduces the amount of copper used in both the house wiring and manufacture. In multi-family applications, this can also significantly reduce the size of distribution panels and wiring risers.

CONSISTENCY: All of the factors considered in the evaluation process must be scientifically verifiable and consistently applied to all products. The proposed policy change is based on a consideration that is not applied to other like products. Under the current EPA rating system, there is a penalty applied to combos that is not applied to any other washer. As an example, Energy Star maintains a list of certified ceiling fans even if the lighting system used with them is not in the program. The Department of Energy has recognized ventless condensing dryers since preliminary testing in 1986 and has not developed a standardized test of energy consumption and efficiency.

LOGICAL APPLICATION: The mission of the EPA Energy Star program is to reduce energy consumption and promote efficiency. Condensing (ductless) dryers have a greater potential at reducing home energy consumption in a cost-efficient manner than any other consumer product available today.

The dryers you have in your homes, pull 10,000 cubic feet of conditioned air out of your home every dry cycle and then exhaust it to the outside with a full load of lint, hot air and moisture. That is based on a 200 cfm rating and a 50 minute cycle. All of this conditioned air must be replaced with infiltrated outside air and either reheated, or cooled. The approximate cost to recondition the outside air is .7 kWh for every 10 degree differential in the inside/outside temperature. If it is 40 degrees out, it costs you approximately 2.1 kWh (\$0.32) just to reheat the air the dryer throws away. The make-up air is non-point infiltration and easy to ignore. When not running, the dryer provides a 4" hole in your wall the leaks energy. All of you have walked into a cool laundry area and know the loss, even if it is not quantified.

The exhausted lint can either become airborne or coat the surrounding area around the vent causing mold and mildew. Inefficient venting can also cause the lint and moisture to become trapped in the ductwork and the body of the dryer, creating prime conditions for mold or dryer fires. Condensing (ductless) dryers exhaust zero air to the outside. Because they are closed systems, they also recapture 50% to 90% of the heat energy. We have been promoting the concept of ventless drying for almost a decade at a variety of national shows, like GreenBuild and AIA. We have worked with the Green Building Council with a variety of manufacturers. We have also talked to a variety of DOE and EPA representatives at these shows about developing reliable tests.

Sincerely,

A handwritten signature in blue ink that reads "Dan Hayes". The signature is written in a cursive, slightly slanted style.

DANIEL HAYES