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Food Equipment Group

March 17, 2020

Tanja Crk, Product Manager, ENERGY STAR Commercial Food Service
U.S. Environmental Protection Agency

Subject: Comments on Limited Topic Proposal for Heat Recovery Credit

Dear Ms. Crk,

Thank you for the opportunity to comment on the modified approach to crediting heat recovery machines in the Version 3.0 ENERGY STAR® Specification for Commercial Dishwashers. Since the new method uses the measured water volume to compute the energy recovery credit, it will be more realistic than the previous proposal that calculated the credit based on the median water consumption of all models in that category.

The new proposed credit subtracts the calculated primary hot water energy consumption from the measured value for energy recovery machines. However, we would have preferred to *add* the primary hot water energy consumption value to *non*-heat recovery models based on their tested inlet water temperature differential from 70°F. This would still provide a leveling mechanism to be able to compare heat recovery machines to non-heat recovery machines. However, this method has the advantage of eliminating the incentive for non-heat recovery machines to test at the maximum inlet water temperature allowed by the test method in order to minimize the amount of energy consumed.

Paragraph 9.3 of both ASTM F1920 and F1696 allows the manufacturer to connect the dishwasher's incoming hot water supply to up to 140°F. Without a penalty for non-heat recovery machines, there is no advantage to test with inlet water lower than 140°F. Most hot water sanitizing models on the market today are designed and marketed to perform with 110°F inlet water temperature. Testing with the highest incoming water temperature allowed will result in the lowest measured operating energy consumption value.

The proposed revision to the definition for heat recovery machines includes the stipulation that the wash and rinse cycle can only have 5% of the total water use come from the hot water supply. Since this is a critical requirement for determining eligibility for the energy recovery credit, we presume this will be required to be verified during the test procedure rather than simply reviewing manufacturer's specifications.

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Comments

Thank you for providing the opportunity to comment on the latest specification for commercial dishwashers. If you have any questions regarding this letter, please don't hesitate to contact us.

Sincerely,



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copies to:

B. Brunswick

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J. Socha

K. Washington

File Hobart Comments – V3-Draft 2-Limited Topic