

Summary and Response to Stakeholder Comments received on the EPA Clarification Letter
ENERGY STAR Program Version 6.1 Product Specification

REF NO.	Comment Summary	ENERGY STAR Response
1	<p>The ENERGY STAR definitions should be aligned with the U.S. Department of Energy (DOE) definitions to reduce manufacturer and consumer confusion. ENERGY STAR does not need to encompass the same DOE regulated scope, but should recognize the DOE foundation and requirements. If EPA would like to expand the scope to include products outside of the DOE definition or preclude a product that falls within the DOE scope, it should provide analysis and seek stakeholder input. By using the clarification procedure and not giving stakeholders the opportunity to comment, EPA has done neither. The proper place to consider changes is the open V7.0 specification development process. This diversion from a clear and structured process diminishes the effectiveness of the ENERGY STAR program.</p>	<p>During the Version 6.0 specification development process, EPA consulted with DOE to confirm that the 10 CFR 430, Subpart B, Appendix J1 test procedure provided for representative testing of products up to 6.0 cu-ft. In both the Draft 1 and Final Draft comment responses as well as in the V6.0 Final Draft specification, EPA informed stakeholders of its intent to allow qualification of clothes washers up to 6.0 cu-ft and invited stakeholder feedback on the definition for commercial clothes washers, which included removal of the DOE maximum capacity definition limits. After consideration of stakeholder comments, EPA released Version 6.0 with the intent that products up to 6.0 cu-ft may be qualified.</p> <p>In explicitly prohibiting qualification of clothes washers larger than 6.0 cu-ft, the Version 6.1 specification clarifies EPA's intent, described throughout the V6.0 specification process.</p>
2	<p>Clarifying that commercial clothes washers may qualify up to 6.0 cu-ft and extending a capacity limitation to residential clothes washers are significant editorial changes. Stakeholders are concerned that Table 5.1 in the DOE clothes washer test procedure is being misinterpreted. Although the table only goes up to 6.0 cu-ft., this does not act as a limit on clothes washer capacity. The limit on capacity for commercial clothes washers is stated in the definition for that product and there is no such limitation for residential clothes washers. Manufacturers need to get a test procedure waiver from DOE in order to extend the load size table for the specified product up to 7.0 cu-ft.</p>	<p>EPA consulted with DOE throughout the Version 6.0 revision as well as for the Version 6.1 clarification. While the commercial clothes washer definition in 10 CFR Part 431.152 contains an upper capacity limit defining DOE's regulatory scope, DOE's test procedure for clothes washers includes a method of test for units with a capacity up to 6.0 cu-ft., which is greater than the capacity limits imposed by the regulatory definition. DOE worked with EPA to ensure the DOE test procedures provides for a method of test to allow for qualification of models up to 6.0 cu-ft. as ENERGY STAR.</p> <p>The V6.1 clarification is consistent with EPA's intent for both residential and commercial models. By including a consistent capacity limit, EPA strives to ensure that only true residential and commercial clothes washers earn the ENERGY STAR. EPA further notes that the largest residential clothes washers are just above 5 cu-ft. EPA is unaware of any practical impacts of the 6.0 cu-ft. maximum capacity limit on ENERGY STAR residential clothes washers as there are real-world appliance size limitations associated with installation of very large units in a residential environment.</p>
3	<p>Allowing units as large as 6.0 cu-ft. is inviting a health safety problem. Products deployed outside of the covered definition are typically found in health care facilities such as hospitals, nursing homes, and institutions, such as prisons. These products are typically Washer-Extractors (W/Xs) and have electronic programmable controls that provide the municipal or state regulation required large amounts of hot water needed to clean fecal material from bed linens and garments. The ENERGY STAR criteria levels cannot be met and still comply with health safety requirements. A third-party determines the program used based on the applicable regulations, so even if a unit is shipped with the controls set to the ENERGY STAR criteria, it would be overridden to a setting that meets the health safety regulations, but not the ENERGY STAR criteria.</p>	<p>EPA does not intend the ENERGY STAR program to run contrary to municipal or state health safety requirements. As part of the V6.0 specification revision process, stakeholders informed EPA that there is a viable market for extra-large capacity, soft-mounted commercial clothes washers in Laundromat and multi-family housing applications. In applications where municipal and health safety regulations exist those standards will drive purchases and ENERGY STAR qualified clothes washers may not be appropriate choices.</p>