

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



OFFICE OF
AIR AND RADIATION

August 1, 2012

Dear ENERGY STAR® Uninterruptible Power Supply (UPS) Partner or Other Stakeholder:

On June 25, the U.S. Environmental Protection Agency (EPA) proposed a minor addition to the requirements for diesel-rotary UPS (DRUPS) systems under the UPS Version 1.0 specification. EPA proposed that DRUPS intended for sale in the United States demonstrate that their diesel engines are in compliance with Clean Air Act (CAA) regulations, 40 CFR Part 60 Subpart IIII.

Under CAA regulations applicable to manufacturers, owners, and operators of stationary, diesel-powered, emergency backup generators and manufacturers of 2007 model year and later stationary diesel engines with a displacement less than 30 liters per cylinder are subject to pollutant emission limits and are required to obtain a certificate of conformity. EPA proposed to require that individual models and representative models used to qualify a product family demonstrate compliance via presentation of the certificate of conformity. EPA also proposed to allow variation in the included engine's make, model, and capabilities between DRUPS models in a product family.

Two stakeholders commented on the proposed requirements:

- One stakeholder commented that a particular DRUPS model may ship with several different engines, and that presenting a certificate of conformity for a particular engine during qualification could limit the manufacturer's ability to use different engines with that model or product family.

EPA has clarified the requirement to explicitly state that only the representative model(s) used in product family qualification shall be required to demonstrate compliance with CAA regulations. Certificates of compliance need not be presented for the other models in a product family, including models with engines different from that of the representative model.

- Another stakeholder asked whether "the new requirements are exempt from the ENERGY STAR third-party certification process and similar to the communications and measurement requirements, [such that] the certificate of conformity 'shall not be reviewed when products are initially qualified or during subsequent verification testing.'" (EPA reserves the right to review documentation on communications and measurement capability at any time).

EPA has maintained that manufacturers must present a certificate of conformity to demonstrate compliance with CAA regulations and qualify a DRUPS model. This requirement therefore differs from the communications and measurement requirements mentioned by the stakeholder. EPA has revised the requirements in section 3.7 to make this clear.

The resultant final requirements, which consist of changes to Section 1.L and inclusion of new Section 3.7 are shown below:

1.L) Product Family: A group of product models that are (1) made by the same manufacturer, (2) subject to the same ENERGY STAR qualification criteria, and (3) of a common basic design. For UPSs, acceptable variations within a product family include:

- 1) Number of installed modules;
- 2) Redundancy;
- 3) Type and quantity of input and output filters;
- 4) Number of rectifier pulses;
- 5) Energy storage system capacity;
- 6) For any diesel coupled rotary UPS, the diesel engine's make, model, and capabilities may vary. If sold in the US, the engine of the representative model must meet the requirements in Section 3.7 below.

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3.7 Diesel Coupled Rotary UPS Emissions Requirements

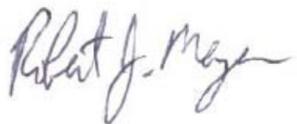
3.7.1 Diesel coupled rotary UPS systems intended for sale in the US must demonstrate that their diesel engines are in compliance with Clean Air Act regulations, 40 CFR part 60 subpart IIII. Compliance shall be demonstrated via presentation of a certificate of conformity with this regulation at the time of qualification.

- i. Systems intended for sale outside the US are not subject to this requirement.
- ii. Only the representative model(s) for testing, as specified in Section 4.2, shall demonstrate compliance with Clean Air Act regulations.

EPA has clarified the Version 1.0 specification to include these changes, and the updated Program Requirements are attached. The clarified specification will retain the 1.0 version number, but will be distinguished from the previous iteration through a revision date, "Jul-2012", present on the first page and in the footer. The effective date of the specification remains August 1, 2012.

Thank you for your continued support of the ENERGY STAR program and please do not hesitate to direct any questions to Meyers.Robert@epa.gov.

Sincerely,



Robert Meyers

Product Manager

ENERGY STAR for UPSs

Enclosures:

Final Version 1.0 Program Requirements for UPS (Rev. Jul-2012)