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October 19, 2011

Via E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Residential Dishwasher Cleanability Test Procedure Webinar

Dear Ms. Stevens:

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this matter. **Please be advised that we support and echo the positions taken by AHAM.** Additionally, we like to emphasize four key Whirlpool positions, which are detailed in the subsequent section of this document. They are as follows:

- 1) Utilize today's efficiency test method (testing with 4, 2, and 1/2 place settings soiled) and score cleaning performance after each energy and water test run.
- 2) Future consideration for the use of a double soil amount (i.e. 8 place settings soiled) for a cleaning performance test, either additional or as a replacement for 4 soiled place settings.
- 3) Maintain no clean-up runs and no filter cleaning between test cycles.
- 4) Focus only on DOE test procedure testing, with 4, 2, and 1/2 place settings soiled and scored for performance, during phase II of the DOE and EPA process.

Utilize today's energy and water test method

In an effort to reduce unneeded testing burdens for manufacturers, leveraging the existing efficiency test method (i.e. testing with 4, 2, and 1/2 place settings soiled) and scoring cleaning performance after each test run would be the most efficient methodology to adopt for this new cleanability scoring process. Another benefit to using the DOE energy test for performance is the manufacturer then must provide both good cleaning performance AND good energy and water efficiency at the same time. When you allow cleaning performance at one test condition and energy and water at another, a manufacturer could elect to optimize their machine for these two separate conditions. We would suggest this be added to webinar slide number 10 as an objective. Moreover, each test of soiled 4, 2, and 1/2 place settings would need to meet a minimum performance threshold value and scores would not be weighted according to the respective 5%, 33%, and 62% soil distribution levels. No matter what the size, consumers desire all of their dish loads to meet a minimum level of cleaning performance, including those with a heavier soil amount.

Use of a double soil amount (i.e. 8 place settings soiled)

Future consideration should be given to using a double soiled amount of dishes (i.e. 8 place settings soiled) for a cleaning performance test, either additional or as a replacement for 4 soiled place settings. In an era when consumers are looking to larger capacity appliances to meet their family needs, ensuring



effective cleaning without having to pre-rinse would maximize water savings by using a test to give them the assurance needed to not have to pre-rinse dish load items. According to the ENERGY STAR website, pre-rinsing dishes alone can use up to 20 gallons of water before the dishes are even loaded into the dishwasher. At 215 cycles a year, that is an additional 4,000 gallons of water per household annually that is at risk.

Maintain no clean-up runs

As with the current test method, there are no clean-up runs between test cycles and no filter cleaning. The original intent of the three tests, beginning with the heavy soil (4 place settings soiled), was to understand the carryover impact of the heavy soils on the two subsequent medium and light soil tests. Keeping this paradigm intact would continue to reflect customer behavior where filters are not necessarily cleaned between each cycle.

Focus only on DOE test procedure testing

With resources being limited and timing being sensitive, further IEC procedure testing, or AHAM 10 / 12 place setting testing, does not add enough value and therefore, the focus needs to be on the DOE procedure testing with 4 (8), 2, and 1/2 place settings soiled and scored for performance, during phase II DOE / EPA work. This will allow for DOE to leverage an existing test method (and learnings) and simply add a performance measure.

A closer look at use of the IEC procedure also identifies results in several considerations. Equipment (drying oven, special microwave, etc.) and dish load items needed for the IEC test carry significant cost which may be difficult for small labs to support. These costs are in addition to the reference machine investment. An alternative to the drying oven method is the table dry method; this requires a dry period of 16-18 hours which is not feasible for larger labs; a significant amount of table space is also "tied up" for this approach. Some IEC dish load and soil items have proven difficult to obtain.

We appreciate your time and look forward to continued collaboration with the EPA going forward. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for Whirlpool Corporation as a leader in designing, producing and marketing ENERGY STAR qualified appliances.

Sincerely,

A handwritten signature in cursive script that reads "Nick Gillespie".

Nick Gillespie
Government Relations Senior Specialist