



April 25, 2012

Rebecca Duff
ICF International

Reference: Commercial Dishwasher Final Draft Test Method and Reporting Template

Subject: Hobart Comments

Dear Ms. Duff,

We have reviewed the final draft test method and the reporting template provided in the April 4 2012 correspondence from Christopher Kent. Our comments are as follows:

Reporting Template

1. Instructions – The instructions state that the template *can* be used for recording data/measurements but it does not state that it must be used. This should be clarified. It further explains that the template is not intended to supersede certification bodies' individual reporting requirements. If the reporting template is mandatory, there is a tremendous amount of information that must be inserted into the spreadsheet, over one hundred entries! If the Certification Body requires their own data submittal documents then this EPA template is a complete waste of time.
2. Excessive Data Entries – The following items are, in our opinion, unnecessary for ENERGY STAR data reporting:
 - General Information – Fax Number, date sample testing began.
 - Unit Under Test Information – Model name, production date, dimensions height, width, depth, type, style and class, size and capacity, booster heater physical and operating characteristics, additional physical and operating characteristics, minimum conveyor speed.
 - Idle Energy Measurements – Test voltage range, ventilation exhaust type and size, components included in manufacturers specified power rating(s).
 - Water Consumption Measurements – Fill level (for pumped sanitizing or post-sanitizing rinse stationary rack machines), dwell time (listed in user manual), water temperature.

Test Method

3. Definition for “User Adjustable” – We are in agreement with this definition and feel it is important to differentiate from controls not intended for the operator to adjust.
4. Test Conduct, Testing Order – We are not sure why the rinse water consumption test must be performed before the idle energy test. We suggest this condition be removed unless there is justification.

5. Energy Saver Mode – Paragraph 4 E states the energy saver mode must be disabled for the idle energy test. This should be revised to state that it should be disabled only if it is user adjustable. If the energy saver mode is built into the machine then it makes no sense to physically modify a control in a manner that would never represent a real world condition.
6. Field Servicing of Components – We appreciate the fact that the wording in section 4 H now allows servicing of components rather than just replacing a machine. It is not uncommon that a product will have a component failure that can easily be fixed on site.
7. Water Consumption Pressure Setting – Lines 554 and 594 state requirements for machines with a final rinse pressure less than 5 psi. NSF 3 requires all fresh water rinse machines to be 5 to 30 psi. These paragraphs should be removed since there should be no machines certified to NSF 3 that operate with a fresh water rinse below 5 psi.
8. Typographical error - Lines 671 and 695 include editorial inaccuracies that should be corrected.
9. Pumped Rinse Conveyor Machines – The paragraph starting on line 681 refers to activating a rinse “solenoid” for pumped rinse machines. The word “solenoid” should be removed since most pumped rinse machines do not use a solenoid but simply activate the rinse pump by electrical means.
10. Wash Tank Temperature – The wash tank temperature may occasionally peak above 15 °F higher than the minimum measured temperature, especially if it is provided with steam heat. This should not be a reason to fail the test. (Line 780)
11. Internal Booster Heater Idle Energy Test – Line 961 (and 1254) states that the test must include the same number of booster heater “on” cycles that where in the dishwasher idle energy test. It is not clear if this refers to the number of booster heater “on” cycles or the number of tank heater “on” cycles from the dishwasher idle test. If the tank heat cycled 20 times during the 3 hr idle test, the booster heater should not be required to cycle that many times. The original wording stated the booster should cycle at least 10 times. This alone could take almost 8 hrs.

Thank you for the opportunity to comment on the second draft. We appreciate the fact that you have carefully reviewed the comments from manufacturers and have incorporated most of them in the final draft test method. If you have any questions regarding this letter, please don't hesitate to call.

Sincerely,



Joel F. Hipp
Warewash Agency Approval Engineer

copies to:

B. Brunswick
C. Kent-EPA

File Comments on final draft test method-Hobart