

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



OFFICE OF
AIR AND RADIATION

May 5, 2011

Dear ENERGY STAR® Commercial Dishwasher Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 2 Version 2.0 ENERGY STAR Commercial Dishwasher specification. Stakeholders are encouraged to submit comments to EPA no later than **June 3, 2011**.

The proposed Draft 2 requirements are based on comments received on the previous Draft 1 version and feedback shared during the ENERGY STAR Stakeholder Meeting held on February 10, 2011 in conjunction with the North American Association of Food Equipment Manufacturers (NAFEM) Show. Meeting notes, presentation slides, and Draft 1 stakeholder comments may be viewed on the commercial dishwasher specification development webpage accessed via: www.energystar.gov/revisedspecs.

The following key changes are proposed in this Draft 2 version:

- **Definitions** – New definitions are proposed for glasswashing, flight type, and pot, pan, and utensil machines.
- **Performance Levels** – EPA reviewed and updated all datasets to remove duplicate listings and discontinued models, and believes that the levels proposed in this Draft 2 version are now representative of the most efficient models in the current marketplace. In addition, maximum water consumption and idle energy levels are proposed for pot, pan, and utensil machines. In determining water consumption limits for these product types, EPA is proposing the use of a “gallons per square foot of rack” (GPSF) metric.
- **Test Procedure** – The NSF/ANSI 3 test standard reference has been updated to reflect the most recent 2010 version.
- **Effective Date** – To provide for additional discussion regarding flight type and pot, pan, and utensil machine requirements, EPA is targeting August 2011 to finalize the Version 2.0 specification and proposing to push the effective date to May 2012.

These proposed changes are discussed in greater detail in the attached Draft 2 specification document.

Flight Type Machines

As discussed during the ENERGY STAR stakeholder meeting, EPA analyzed several potential flight type metrics to determine whether these metrics appeared to drive water consumption and should be considered as candidates for evaluating and comparing machine performance. Several metrics were considered, including conveyor width and chamber volume. However, a strong relationship could not be identified using any of the additional metrics plotted suggesting that gallons per hour (GPH) might serve as a good proxy for determining water efficiency. These data plots will soon be available for review on the ENERGY STAR webpage noted above.

EPA would like to discuss these findings with manufacturers and other interested stakeholders prior to determining an appropriate GPH level. Without an adequate metric, EPA will not be able to include flight type machines in the ENERGY STAR commercial dishwasher specification at this time. As such, EPA will host a focused flight type discussion during the National Restaurant Association (NRA) Show. Meeting details are provided below:

Date: Monday, May 23, 2011

Location: McCormick Place, Room N228

Time: 3:30 – 5:00 p.m.

Manufacturers of flight type machines and other stakeholders interested in participating in this discussion should RSVP to commercialdishwashers@energystar.gov by **May 17, 2011**.

ENERGY STAR Rinse Water Test Method

EPA has received several questions from laboratories and Certification Bodies (CB) regarding guidance for measuring final rinse water consumption. Although manufacturers and laboratories participating in the NSF certification program have received consistent guidance on measuring final rinse water consumption, the test method itself is not included in the NSF/ANSI 3 standard .

Following discussions with NSF, EPA has decided to adopt an established final rinse water consumption test method for purposes of ENERGY STAR qualification. This test method was developed based on guidance currently provided by NSF. EPA understands that NSF is considering adding a final rinse water test method as an appendix to the NSF/ANSI 3 standard but this will take some time to develop and finalize. EPA is working with the U.S. Department of Energy to review and validate the test method. Stakeholders are encouraged to review and provide feedback on this draft ENERGY STAR test method along with the Draft 2 specification.

Submittal of Written Comments

Stakeholders are encouraged to submit written comments on the Draft 2 Version 2.0 specification to commercialdishwashers@energystar.gov by **June 3, 2011**. All comments will be posted to the ENERGY STAR Product Development website unless the submitter requests otherwise.

Thank you for taking the time to review this draft specification. Stakeholders with questions or concerns can contact me directly at (202) 343-9046 and via e-mail at kent.christopher@epa.gov or Rebecca Duff, ICF International, at (434) 202-7875 and rduff@icfi.com.

Sincerely,



Christopher Kent, U.S. EPA
ENERGY STAR Product Specification Development