

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



OFFICE OF
AIR AND RADIATION

January 4, 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 1 Version 2.0 ENERGY STAR Commercial Dishwasher specification. Stakeholders are encouraged to submit comments on this proposal to EPA no later than **January 28, 2011**. EPA will discuss the Draft 1 proposal during the upcoming North American Association of Food Equipment Manufacturers (NAFEM) Show on February 10, 2011. Details on this meeting are provided below.

Overview of Draft 1 Proposal

The Draft 1 specification proposes new performance levels across all machine types currently covered by ENERGY STAR, including: under counter; single-tank door type; single-tank conveyor; and multi-tank conveyor.

As represented in the scatter plots posted on the ENERGY STAR website, EPA added non-ENERGY STAR qualified models listed in the NSF Directory to our data set to represent the current inventory of products available. However, idle energy data is not available for these additional data points. Therefore, for purposes of this Draft 1 analysis EPA has assumed that these models are able to meet the existing ENERGY STAR Version 1.2 idle energy rate levels. Stakeholders are encouraged to share idle energy performance data on non-qualified machines for EPA consideration.

More details regarding EPA's analysis of the different machine types are provided in the attached Draft 1 specification.

Additional minor changes proposed include:

- Revising the definitions in Section 1 to align with the most recent version of NSF 170: Glossary of Food Equipment Terminology;
- Removal of the exclusion of dishwashers that include a rinse cycle following the sanitation rinse in Section 2; and
- Updating the NSF/ANSI 3 test standard reference to represent the latest 2009 version available in Table 1 of Section 4.

Flight Type Conveyors

EPA continues to be interested in including flight type conveyors in the ENERGY STAR program. Based on initial review of water consumption data provided in the NSF Directory, EPA believes that ENERGY STAR can help to differentiate top performers and offer the end user significant energy and water savings.

A challenge exists in that the current ENERGY STAR "gallons per rack" metric cannot be applied to flight type machines. Several manufacturers have suggested that EPA use a "gallons per 100 dishes" metric to measure rinse water consumption. EPA is considering taking this approach but only if standard inputs can be chosen that provides a level playing field and best emulates how the machine will perform in the

field. This might be achieved by using a standard peg spacing requirement and the lowest conveyor speed setting when calculating “gallons per 100 dishes”.

Stakeholders are encouraged to provide suggestions to EPA on how flight type conveyors might be evaluated for ENERGY STAR qualification. In addition, EPA is interested in learning more about the energy consumed by these machines while in idle mode.

Field Adjustment of Chemical Sanitizing/Low Temp Machines

Several manufacturers have expressed concern that when testing and qualifying low temp machines, competitors are using the lowest water consumption setting where higher water consumption settings are more typical of actual usage. EPA recognizes that flexibility in the water consumption setting is required to ensure the right balance of chemicals and water in order to achieve proper sanitation and cleanliness based on water hardness and other factors. EPA also understands that asking manufacturers to test in the worst case scenario (i.e., highest water consumption setting) may not align with the worst case scenario in regards to sanitation and could result in additional manufacturer testing. Instead, EPA is interested in stakeholder input on ways in which distributors, installers, and end users might become better educated regarding the implications on ENERGY STAR performance from adjusting the water consumption settings on-site.

Submittal of Written Comments

Stakeholders are encouraged to submit written comments on the Draft 1 Version 2.0 specification to commercialdishwashers@energystar.gov by **January 28, 2011**. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests otherwise.

To track EPA's progress in revising the ENERGY STAR Commercial Dishwasher specification, visit the Product Development website at www.energystar.gov/revisedspecs. All specification development materials, including data plots to support the Draft 1 proposal, will be posted to this website.

ENERGY STAR Stakeholder Meeting at NAFEM

EPA will host a stakeholder meeting to discuss the Draft 1 specification, and feedback received during the comment period, on **Thursday, February 10, 2011** from 8:00 – 10:00 AM in Room S311 at the Orange County Convention Center prior to the NAFEM Show. Stakeholders interested in attending the discussion should RSVP to commercialdishwashers@energystar.gov by **January 28, 2011**.

ENERGY STAR representatives will also be available to meet with stakeholders during the NAFEM Show February 10 – 12. Interested parties can contact Rebecca Duff, ICF International, at (202) 862-1266 to schedule a meeting.

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 at (202) 862-1266 and rduff@icfi.com.

Sincerely,



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