



Serving the Vending, Coffee Service and Foodservice Management Industries

April 6, 2012

Mr. Christopher Kent
U.S. Environmental Protection Agency
Office of Air and Radiation
ENERGY STAR Product Development
Washington, D.C. 20005

Dear Mr. Kent:

The National Automatic Merchandising Association (NAMA) appreciates the opportunity to comment on Draft 2 of the proposed Version 3.0 Energy Star Refrigerated Beverage Vending Machine Specifications. As the national trade association of the food and refreshment vending, coffee service, and food service management industries, we, along with our coalition partners in vending machine manufacturing support the Energy Star proposal to align the draft specification to synchronize the definitions, metrics, and test procedures with the Department of Energy (DOE) Final Rule energy conservation standards.

Type B Vending Machines

With respect to Type B vending machines, we believe that the Draft 2 change reflecting a 10% reduction over DOE requirements to qualify for the Energy Star designation, while aggressive, may be achievable for both HFC refrigerant (R134a) equipped vending machines and CO₂ refrigerant (R744) equipped machines. However, the use of CO₂ refrigerants is still new to the industry. In fact, there are only two (2) commercial vending machines that operate with CO₂ refrigerant currently: the RVCC660CO2 by Royal Vendors and the V821CNC by SandenVendo.

Therefore, as will be discussed further below, we believe that original equipment manufacturers (OEMs) should be given additional time to develop and optimize the machines using the CO₂ technology.

Type A Vending Machines

We still support the continued inclusion of Type A vending machine equipment in the Energy Star Program. However, according to our coalition partners, the industry will not be able to initially produce Type A vending machines featuring R744 refrigerant given the targets outlined in the Draft 2 proposal.

Type A vending machines with CO₂ refrigerant are in the early stages of development, therefore, all of the necessary components to optimize R744 refrigeration systems are not commercially available.

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Over time, as the industry adopts R744 refrigeration systems, the industry will eventually build its expertise in designing these systems and additional components will become available to allow improvements in energy efficiency. In the immediate future, however, the current Energy Star proposal for Type A machines has the effect of an EPA endorsement of high GWP pollutants identified by the EPA as atmospheric pollutants.

The magnitude of the change for Type A vending machines from today's standard to tomorrow's standard may result in a decline in the total number of vending machines meeting Energy Star program requirements. It is believed that little to zero remanufactured as well as new Type A venders with R744 will be built initially. Furthermore, it is believed that the number of new Type A venders with R134a will decline initially as the industry seeks to find solutions to further drive efficiency in these models.

We anticipate that it may be technically achievable to deliver remanufactured Type A vending machines which meet the new standard; however, it could be cost prohibitive to do so.

Extending the implementation date for Type A vending machines could assist in delivering more energy efficient and refrigerant friendly vending machines, resulting in greater environmental benefit over the long term.

NAMA's Suggestions for Next Steps on the Proposed Levels for Type A and Type B Machines

Based upon the information stated above, NAMA suggests that the EPA specify Energy Star MDEC (Maximum Daily Energy Consumption) levels for vending machines as a two-step process:

- **Step 1:** The MDEC should be maintained at levels specified in Draft 2 for vending machines using conventional HFC refrigerants (such as HFC 134a).
- **Step 2:** The MDEC should be the same as DOE requirements for venders using natural refrigerants (such as CO₂) until **August 31, 2013** with a provision that states the requirements will revert to Step 1 (as referenced above) ***after*** August 31, 2013.

Thank you for your consideration. Please feel free to contact us at (626) 229-0777 or via email at slarson@vending.org or sedwards@vending.org should you have any questions.

Regards,

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