

Summary and Response to Stakeholder Comments

ENERGY STAR Program Requirements Product Specification for Commercial Dishwashers Final Draft Test Method (Rev. Apr-2012)

I. TEST CONDUCT

#Key	Comment Summary	Response
1	The stakeholder does not understand why the rinse water consumption test must be performed before the idle energy test. The stakeholder suggests this condition be removed unless there is justification.	The water consumption setup specifies test settings that should be retained for the idle energy test. The water consumption test allows user adjustments to ensure that the machine is operating correctly. DOE would like to retain those adjustments during the idle energy test for consistency. The testing order requirement has not been changed in the ENERGY STAR Final Test Method (Rev. May-2012).
2	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.	It is usually possible to disable the energy saver mode setting even it is not user adjustable (i.e. the owner may contact a technician to disable it). The ENERGY STAR Final Test Method (Rev. May-2012) has retained the requirement, and added clarification that Energy Saver Mode shall be disabled during testing, whether or not the mode is user adjustable, to provide data based on a worst case scenario; however, EPA is considering ways to provide users with information about Energy Saver Mode and its potential to save energy. EPA will address this comment in the final draft specification.

II. TEST SETUP

#Key	Comment Summary	Response
3	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.	The referenced paragraph specifies a range of less than or equal to 5 psig, not a rating of less than or equal to 5 psig. The referenced paragraph is consistent with the requirements in NSF/ANSI 3-2010. Language regarding pressure requirements has not been changed in the ENERGY STAR Final Test Method (Rev. May-2012).

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III. TEST METHOD

#Key	Comment Summary	Response
4	Lines 671 and 695 include editorial inaccuracies that should be corrected.	DOE and EPA apologize for the errors in the PDF version of the test method. The correct language is "Repeat steps a) and b) five times". The correct language has been specified in the ENERGY STAR Final Test Method (Rev. May-2012).
5	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.	The word "solenoid" has been removed in the ENERGY STAR Final Test Method (Rev. May-2012).
6	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)	A temperature upper limit needs to be specified since higher temperatures consume more energy. The current limit of 15 °F higher than the minimum measured temperature is the industry accepted standard. Language regarding the maximum temperature has not been changed in the ENERGY STAR Final Test Method (Rev. May-2012).
7	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.	<p>To clarify, these steps have been revised in the ENERGY STAR Final Test Method (Rev. May-2012) to:</p> <p>"If the booster heater idle energy cannot be simultaneously measured with the Dishwasher idle energy, the booster heater idle energy may be monitored at a different time; however, the number of booster heater "on" cycles in the separate test must be equivalent to the number of booster heater "on" cycles in the Dishwasher idle energy test."</p> <p>The intention of this step is to ensure that, when separately monitored, the booster heater idle energy is the same as it was when the total Dishwasher idle energy was measured so that the calculations are accurate and consistent.</p>

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IV. TEST REPORTING TEMPLATE

#Key	Comment Summary	Response
8	<p>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.</p>	<p>Language clarifying that the test reporting template is not mandatory has been added to the Commercial Dishwashers Test Reporting Template. The test reporting template is intended to act as a supplement to Certification Body reporting as a way for DOE and EPA to collect data. While it is not mandatory, DOE and EPA would appreciate if the information were provided.</p>
9	<p>The following items are, in the stakeholder's opinion, unnecessary for ENERGY STAR data reporting:</p> <p>General Information – Fax Number, date sample testing began.</p> <p>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.</p> <p>Idle Energy Measurements – Test voltage range, ventilation exhaust type and size, components included in manufacturers specified power rating(s).</p> <p>Water Consumption Measurements – Fill level (for pumped sanitizing or post-sanitizing rinse stationary rack machines), dwell time (listed in user manual), water temperature.</p>	<p>Language clarifying that the test reporting template is not mandatory has been added to the Commercial Dishwashers Test Reporting Template. The test reporting template is intended to act as a supplement to Certification Body reporting as a way for DOE and EPA to collect data. While it is not mandatory, DOE and EPA would appreciate if the information were provided.</p>