

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



OFFICE OF
AIR AND RADIATION

September 1, 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 3 ENERGY STAR Version 2.0 Commercial Dishwasher specification. Stakeholders are encouraged to submit comments to EPA no later than **October 7, 2011**.

EPA plans to hold a stakeholder webinar in mid-October to discuss comments received on the Draft 3 proposal. Stakeholders will receive a separate email with additional information regarding meeting date and time within the next two weeks.

The proposed Draft 3 requirements reflect comments received on the previous Draft 2 version and the ENERGY STAR Flight Type Discussion Document. All specification documentation will be available for review on the ENERGY STAR Product Development website at: www.energystar.gov/revisedspecc (click on Commercial Dishwashers).

The following key changes are proposed in this Draft 3 version:

- **Definitions** – Single tank conveyor and flight type machine definitions have been revised to further clarify scope and new definitions describing sanitation methods and operating modes are also proposed. Stakeholders are encouraged to provide feedback on approaches to addressing models that offer different fuel source options for purposes of qualifying a product family.
- **Performance Levels** – Water consumption levels are now proposed for flight type machines based on conveyor area, speed, and gallons per hour (GPH) data. Levels for high temp under counter and multi tank conveyor machines have been slightly adjusted to increase product availability.
- **Gallon Per Rack Calculations** – New, more detailed equations are provided for purposes of calculating GPH and GPR for stationary rack and conveyor type machines. These calculations were developed based on discussions with NSF and are meant to further clarify the equations provided in the existing Version 1.2 specification.
- **Test Procedure** – The ASTM F1920 test standard reference has been updated to reflect the most recent 2011 version. A clarification has been added that idle energy rate should represent the tank heater as well as controls but not external/internal booster heaters. EPA is also considering excluding chemical dump machines from idle energy testing due to the absence of a tank maintenance heater.
- **Effective Date** – An effective date of September 1, 2012 is now proposed to allow additional time for test procedure validation during this revision process. EPA's goal is to finalize this Version 2.0 specification by the end of this year.

These proposed changes, and additional minor updates, are identified and discussed in greater detail in text boxes presented throughout the attached Draft 3 specification.

Validation of ENERGY STAR Referenced Test Standards

The U.S. Department of Energy (DOE) is in the process of testing commercial dishwashers to validate the ASTM, NSF, and ENERGY STAR test procedures listed in the Version 2.0 specification. It is important that prior to EPA finalizing this specification, these test procedures are validated and revised, as needed, to produce accurate and repeatable results. Clarifications to the procedures may also be required to ensure that all EPA recognized laboratories are applying the test conditions and methods in the same manner. DOE anticipates finishing this testing and method review effort by the end of September. Once final, EPA will release DOE's proposed test procedure for stakeholder review, which will incorporate any clarifications to external industry test methods, as well as the proposed ENERGY STAR test method, into a step-by-step format for measuring and determining performance.

Submittal of Written Comments

Stakeholders are encouraged to submit written comments on the Draft 3 Version 2.0 specification to commercialdishwashers@energystar.gov by **October 7, 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,

A handwritten signature in black ink that reads "Christopher Kent". The signature is written in a cursive style with a large initial "C".

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