

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



OFFICE OF
AIR AND RADIATION

May 13, 2010

Dear Commercial Dishwasher Manufacturer or Other Interested Party:

With this letter, the U.S. Environmental Protection Agency (EPA) is launching efforts to revise the ENERGY STAR® Version 1.1 Commercial Dishwasher specification. The current ENERGY STAR specification has been in place since October 2007 and market share of qualified models has quickly grown. In 2008, EPA estimated U.S. market penetration to be more than 80% and 2009 results are expected to be even higher.

To ensure that ENERGY STAR continues to represent the top performers in terms of energy efficiency, EPA will be revisiting the current ENERGY STAR requirements to determine new performance levels. This letter frames the expected scope of this revision and invites your participation in the specification development process.

Expected Scope of Revision

Gallons per Rack (GPR) and Idle Energy Rate Requirements

EPA will use both the ENERGY STAR Qualified Product List and NSF Certified Products Directory to determine preliminary levels for stakeholder review and comment in a Draft 1 Version 2.0 specification to be released shortly following the upcoming National Restaurant Association (NRA) Show. EPA is aware of some manufacturer concerns regarding cleanability and sanitation with the lowering of GPR limits and will work with stakeholders to determine new requirements that achieve greater energy and water savings while maintaining performance.

ASTM Test Standards

During this revision process, EPA will also be evaluating the following ASTM test standards for potential use in measuring total machine energy performance:

- ASTM Standard F1696, *Standard Test Method for Energy Performance of Single-Rack Hot Water Sanitizing, Door-Type Commercial Dishwashing Machines*
- ASTM Standard F1920, *Standard Test Method for Energy Performance of Rack Conveyor, Hot Water Sanitizing, Commercial Dishwashing Machines*

Both ASTM test standards are currently being used by ENERGY STAR partners to determine idle energy rate for qualified undercounter, door type, and conveyor machines. The ASTM F26 Committee is currently working to finalize these test standards over the next several months. Once finalized it is EPA's intention to encourage manufacturers to begin using these ASTM test standards to evaluate total machine energy performance with the purpose of building a dataset from which draft requirements can be proposed. EPA expects that this testing effort will take several months and therefore, intends to move forward with GPR and Idle Energy Rate revision efforts and evaluate potential total energy consumption requirements at a later date.

Manufacturers are encouraged to review the latest versions of these ASTM test standards and participate in the revision process. For more information regarding this effort please contact David Zabrowski, Fisher Nickel, Inc., at dzabrowski@fishnick.com.

Additional Product Categories

EPA has received interest from several commercial dishwasher manufacturers and other interested stakeholders in adding flight type machines to the ENERGY STAR suite of eligible commercial dishwasher types. As such, EPA will evaluate the potential for adding these product types under the new Version 2.0 specification.

Stakeholders are encouraged to submit any additional suggestions or needed clarifications to EPA by June 1 to be considered in the Draft 1 specification.

Next Steps

As EPA moves forward with revising the current requirements, we will solicit input from all stakeholders on an ongoing basis via draft specifications, e-mail updates, and stakeholder meetings. As a first step, EPA would like to discuss the existing Version 1.1 requirements and ASTM test standards with commercial dishwasher manufacturers during the NRA Show, May 22 – 25.

Please contact Rebecca Duff, ICF International, at rduff@icfi.com or (202) 862-1266 if you would like to schedule a particular time to meet during the show.

All EPA correspondence and specification documents will be posted throughout the revision process to the ENERGY STAR Commercial Dishwasher Specification Development Web page which can be accessed through: www.energystar.gov/revisedspecs. In addition, all written comments received by EPA will be posted to this Web page unless requested otherwise by the submitter.

The exchange of ideas and information between EPA, industry, and other interested parties is critical to the success of ENERGY STAR. Your input is very valuable during this specification review process. If you are not familiar with the ENERGY STAR Guiding Principles, you are encouraged to review them at www.energystar.gov/productdevelopment. In addition, please feel free to contact me at (202) 343-9046 or kent.christopher@epa.gov with any questions or comments.

Thank you for your continued support of ENERGY STAR. I look forward to working with you during the specification revision process.

Sincerely,



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