

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

OFFICE OF AIR AND RADIATION

March 26, 2007

Dear Commercial Dishwasher Manufacturer or Other Industry Stakeholder:

EPA welcomes your input on the attached **Draft 2** ENERGY STAR specification for Commercial Dishwashers. This Draft 2 specification reflects comments received on the previous Draft 1 document and idle energy use data submitted by manufacturers for EPA consideration. Specifically, stakeholders will notice the following key changes in this latest version:

- Definitions for high temp, low temp, stationary single tank door-type, under counter, and single tank conveyor dishwashers have been modified to reflect typical dishwasher design and operation. A definition for multiple tank conveyor dishwasher has also been added.
- Performance requirements have been added for multiple tank conveyor machines.
- Pot, pan, and utensil machines are eligible to qualify as ENERGY STAR if they meet the stationary single-tank door type performance requirements. Glassware and flight type machines continue to be excluded from this specification.
- Maximum idle energy rates are proposed for all machine types.
- A clarification has been added that machines that are interchangeable in the field from high temp to low temp, and vice versa, must meet both low and high temp performance requirements to qualify as ENERGY STAR.
- References to ASTM Standards F1696 and F1920 have been added to Section 4: Test Criteria. Manufacturers are required to use these test procedures to measure and report idle energy rates for ENERGY STAR qualification.

More details regarding EPA's rationale for making these changes are included in note boxes throughout the document.

Stakeholders are encouraged to provide written comments for EPA consideration to Rebecca Duff, ICF International, at rduff@icfi.com by April 23, 2007. All comments will be posted to the ENERGY STAR Product Development Web site unless the submitter requests that their comments remain confidential. If you support the Draft 2 specification, please state this in writing or via email. It is equally important that EPA understand which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress in revising the ENERGY STAR commercial dishwasher specification, visit the Product Development Web site at www.energystar.gov/productdevelopment and click on "New Specifications in Development".

Thank you for taking the time to review this draft specification. I look forward to working with you over the next few months to finalize and launch this new ENERGY STAR product category. Please feel free to contact me directly with any questions or concerns at (202) 343-9124 or via e-mail at schmeltz.rachel@epa.gov.

Sincerely,

Rachel Schmeltz

ENERGY STAR Product Development