



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

OFFICE OF  
AIR AND RADIATION

June 15, 2007

Dear Commercial Dishwasher Manufacturer or Other Industry Stakeholder:

EPA welcomes your input on the attached **Final Draft** ENERGY STAR specification for Commercial Dishwashers. All stakeholders are encouraged to review the draft specification and provide any final comments to Rebecca Duff, ICF International, at [rduff@icfi.com](mailto:rduff@icfi.com) by **June 29, 2007**. This Final Draft specification reflects comments received on the previous Draft 2 document and stakeholder discussions during the industry meeting EPA hosted at the National Restaurant Association Show on May 21, 2007. Please note that this is the final opportunity to comment on the specification prior to finalization.

Specifically, stakeholders will notice the following key changes in this latest version:

- Minor modifications have been made to definitions for undercounter, door type, and multiple tank machines.
- Language has been added to Section 2 that EPA may consider other product categories, including flight type machines, in future versions of the specification.
- Additional guidance regarding rack length and rounding of gallons per rack (GPR) and idle energy rate is now included in Section 3 to ensure consistency in manufacturer reporting of product performance.
- New idle energy rates are proposed for high and low temperature multiple tank machines to better reflect the collective heat energy needed to maintain required temperatures for more than one tank.
- New GPR levels are being proposed for low temperature single tank door type machines and single tank conveyor machines based on revisions to the EPA dataset, which was updated to reflect current models available for sale in the marketplace.
- A requirement that all qualifying commercial dishwashers be certified to NSF/ANSI 3-2003 has been added to Section 4 to ensure that sanitation and cleanliness are maintained while using less energy and water to operate.
- Language has been added to Section 6 that EPA will revisit the idle energy dataset within two years of the effective date to determine whether the limits provided in Table 1 provide for sufficient differentiation in the marketplace.

More details regarding EPA's rationale for making these changes are included in note boxes throughout the document. Rationale is also provided for those items that EPA did not change as a result of stakeholder comments.

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 Final Draft 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](http://www.energystar.gov/productdevelopment) and click on "New Specifications in Development".

Thank you for taking the time to review this draft specification. Please feel free to contact me directly with any questions or concerns at (202) 343-9124 or [schmeltz.rachel@epa.gov](mailto:schmeltz.rachel@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Rachel Schmeltz". The signature is written in a cursive style with a long, sweeping tail on the letter "z".

Rachel Schmeltz  
ENERGY STAR Product Development