



May 31, 2006

Charles Anderson  
ICF International

Subject: Comments on Draft 1 Commercial Dishwasher Specification

Dear Mr. Anderson,

We have reviewed the Draft 1 Energy Star specification for commercial dishwashers. Our comments are as follows:

1. The categories of commercial dishwashers eligible to “compete” for the energy star efficiency requirements should be expanded to include those listed in the table below.

<b>Table 1: Efficiency Requirements for Commercial Dishwashers</b>		
<b>Category</b>	<b>Efficiency Requirements</b>	
	<b>High Temperature</b>	<b>Low Temperature</b>
Undercounter		
Fresh water rinse		
Dump type		
Stationary rack, single tank door		
Fresh water rinse		
Dump type		
Stationary rack, single tank door, two rack		
Fresh water rinse		
Dump type		
Single tank, rack conveyor		
Multiple tank, rack conveyor		
Single tank, rackless conveyor		
Multiple tank, rackless conveyor		
Pot and pan washers		
Door-type, two rack		N/A
Multiple tank, rack conveyor		N/A
Multiple tank, rackless conveyor		N/A
Glass washing machines		
Undercounter, fresh water rinse		

2. Definitions should be expanded to include the categories from Table 1 not previously identified.
3. The definition for conveyor dishwashers should be modified to allow an auxiliary rinse or dual rinse section before the final rinse.
4. Manufacturers will need to provide an up-to-date list of current production models and their category for fresh-water rinse or dump type.

5. Recommendation should be made to NSF International and to UL to request the Certification Records be displayed in compatible categories as those shown in Table 1 above.
6. Water usage requirements from the table will need to be re-calculated due to the additional categories.
7. Since a rackless conveyor dishwasher is not rated in racks/hr, the formula for the efficiency specification should be derived using a nominal "gallons per 100 dishes". An example would be as follows:

Per NSF: Dishes per Hour for Rackless Conveyor Dishwashers =  $(120)(CS)(CW) / PD$

CW = Conveyor width measured in inches.

PD = Distance between pegs in the direction of conveyor travel measured in inches

$$GP100D \text{ (gallons per 100 dishes)} = \frac{100(GPH)(PD)}{120(CW)(CS)}$$

We will continue to work with ASTM to develop the standard test methods for performance of commercial dishwashers. If you have any questions regarding these comments, please don't hesitate to call.

Sincerely,

copies to:

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File (2) Comments-Hobart

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