Appliance Standards Awareness Project
Natural Resources Defense Council

July 19, 2021

Mr. Bryan Berringer
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2J
1000 Independence Avenue SW
Washington, DC 20585

RE: Docket Number EERE–2019–BT–TP–0025/RIN 1904–AE55: Notice of Proposed Rulemaking for Test Procedure for Commercial Prerinse Spray Valves

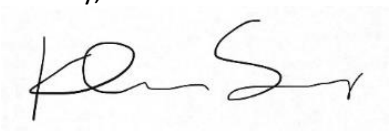
Dear Mr. Berringer:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and Natural Resources Defense Council (NRDC) on the notice of proposed rulemaking (NOPR) for the test procedure for commercial prerinse spray valves. 86 Fed. Reg. 27298 (May 20, 2021). We appreciate the opportunity to provide input to the Department.

We support the new proposed definition for "commercial prerinse spray valve" (CPSV). Currently, a CPSV is defined as "a handheld device that has a release-to-close valve and is suitable for removing food residue from food service items before cleaning them in commercial dishwashing or ware washing equipment,"[1] and any product meeting this definition must meet DOE's efficiency standards. However, as detailed in our comments on the 2020 RFI for CPSV standards, there are many CPSV models that appear to meet the current definition of a CPSV, yet do not meet the efficiency standards that DOE adopted in 2016.[2] Considerable water savings are likely being lost due to these noncompliant products. We believe that the new definition that DOE proposes in this NOPR encompasses the CPSV models in violation and will help close loopholes in the current standards. Furthermore, as DOE notes in the NOPR, DOE's proposal would codify existing guidance regarding the application of the current definition.

Thank you for considering these comments.

Sincerely,



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[1] 10 CFR § 431.262.
[2] https://www.regulations.gov/comment/EERE-2019-BT-STD-0034-0005.