



Comments on the February 2013 WaterSense<sup>®</sup>  
Draft Specification for Commercial Pre-Rinse Spray  
Valves

May 30, 2013

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**Commenter:** Norm Kummerlen  
**Affiliation:** Unaffiliated  
**Comment Date:** February 21, 2013 and March 13, 2013

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***Email Text:***

2/21/2013

Dear Water Sense;

I did a overview of the WaterSense proposal for Prerinse Spray valves and other than WS adding some language regarding marking, WS has not addressed my previous comments which I will sustain until an acceptable explanation is received.

The version of ASTM F2324 is different from any version I have seen so far. Many sections are basically unchanged from my previous comments which I still sustain.

In addition:

Section 2.1 of the spec omits the flow rate test exception:

2.1 The pre-rinse spray valve shall conform to applicable requirements in *ASME A112.18.1/CSA B125.1 Plumbing Supply Fittings*,<sup>1</sup> with the exception of the life cycle test requirements described in Section 4.2 below and the Flow rate test in 3.0 below.

Section 4.1.1 and 5.1.5 has force marking in only ounces when it should be ounce-force and gram-force.

4.1.1 The minimum spray force shall not be less than 5.0 ounces-force (ozf) [142 grams-force (gramf)].

5.1.5 The spray force marking shall be in ounces in two-digit resolution (e.g., 5.0 ounces-force (ozf) [142 grams-force (gramf)].

Section should be added to control override:

High-efficiency Commercial Pre-rinse spray valves shall not be packaged, marked, or provided with instructions directing the user to an alternative water-use setting that would override the maximum flow rate specified in Section 5.1.4. Instructions related to the maintenance of the devices, including changing or cleaning Pre-rinse spray valve components, shall direct the user on how to return the device to its intended maximum flow rate.

Sincerely,

Norman Kummerlen, P.E.  
5539 Beavercrest Drive

Lorain, Ohio 44053  
Cell: 216-396-2909  
E-mail: norm.kummerlen@gmail.com

***Email Response for Clarification:***

Dear Norm,

Thank you for these comments. We have received and logged the comments you submitted.

In your email, you referenced your previous comments on the draft update to the ASME/CSA plumbing fittings standard and the ASTM F2324 Standard Test Method on Prerinse Spray Valves.

We wanted to clarify a couple of things with you with regard to those comments. First, WaterSense is not accepting or resolving any comments on the ASTM F2324 test method. Comments on the test method should be submitted via the ASTM ballot and will be resolved through their due process. Second, the comments you submitted on the draft update to the ASME/CSA standard are not part of WaterSense's public record. Since the draft specification and the ASME/CSA plumbing fittings standard are two separate documents with different intents, it possible that some of your comments on the draft standard updates are not applicable to the draft specification.

Could you submit a full version of comments you have on the WaterSense Draft Specification for Commercial Pre-Rinse Spray valves only? This way all of your comments will be maintained in the public record and will be responded to through the comment/response process.

We appreciate your continued support of the WaterSense program!

Best regards,  
Holly

Holly Cannon  
ERG for EPA's WaterSense Program  
[watersense-products@erq.com](mailto:watersense-products@erq.com)

***Email Text:***

3/13/2013

Dear Holly;

Thank you for the clarification. I have attached my comments to the WaterSense Specification only.

It is interesting that Water Sense is not taking comments on the draft ASTM F2324 specification and will accept anything that ASTM comes up with in their process. I would have thought that WaterSense would want comment on the ASTM draft so they could decide if the final document is acceptable or not.

Norman Kummerlen, P.E.  
5539 Beavercrest Drive  
Lorain, Ohio 44053  
Cell: 216-396-2909  
E-mail: norm.kummerlen@gmail.com

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***Email Attachment:***

Section 2.1 of the spec omits the flow rate test exception:

2.1 The pre-rinse spray valve shall conform to applicable requirements in *ASME A112.18.1/CSA B125.1 Plumbing Supply Fittings*,<sup>1</sup> with the exception of the life cycle test requirements described in Section 4.2 below and the Flow rate test in 3.0 below.

4.1 The spray force of the pre-rinse spray valve shall be tested in accordance with the procedures in *ASTM F23242* and shall meet the following criteria:

4.1.1 The minimum spray force shall not be less than 5.0 ounces ~~s~~ -force (ozf) (142 grams ~~-force (gramf)~~).

Better language to agree with sect 5.1.5 for 2 digit resolution

4.1.1 The minimum spray force shall not be less than 5.0 ounces ~~s~~ -force (ozf) (~~142 grams~~ 1.4 Newton (1.4 N))).

*Reason; The correct nomenclature for force is Ounce force (ozf) and grams force (gramf) or Newton (N) Newton are better for agreement with section 5.1.5.*

4.2 The life cycle of the pre-rinse spray valve shall be tested in accordance with the procedures in *ASME A112.18.1/CSA B125.1* and shall meet the following criteria:

4.2.1 The pre-rinse spray valves must perform for ~~500,000~~ 150,000 cycles.

*Reason; The justification for 500,000 cycles is arbitrary: "using an average use time of 10 second per use and one hour per day and found 131,000 cycles in a year. If a spray valve should last for 3 to 5 years, this would come out to approximately 500,000 cycles." Why wouldn't 50 cycles for the breakfast cleanup, 75 for lunch and 125 for dinner clean up be just as realistic? Using 250cycles per day and 300 days per year for 2 years = 150,000 cycles. Pre-rinse spray valves have been certified at 150,000 for years. Is there field data to support this enormous change to 500,000 cycles? The requirements in this standard are a minimum performance requirement. Ms. Cannon indicated that based*

*upon her experience with the products in the field and the rate of breakage” but there was no confirmation that these were certified to the ASME/CSA standard. The notes from the last meeting indicated that the increased life cycles if approved would only apply to high-efficiency PRSV’s.*

5.1.5 The spray force marking shall be in ounces force (ozf) and Newton in two-digit resolution (e.g., 5.0 ~~ounces~~ ozf (1.4 N)).

*Reason; Throughout the specification Metric conversions are used and the correct nomenclature for force is Ounce force (ozf) and grams force (gramsf) or Newton (N)*

**Commenter:** Len Swatkowski  
**Affiliation:** Plumbing Manufacturers International (PMI)  
**Comment Date:** March 11, 2013

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***Email Attachment:***

**Template for Public Comment Submission on WaterSense® Draft Specification for  
Commercial Pre-Rinse Spray Valves**

Commenter Name: Len Swatkowski

Commenter Affiliation: Plumbing Manufacturers International (PMI)

Date of Comment Submission: March 11, 2013

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Topic: Ultra Low Flow Pre-rinse Spray Valve (ULF-PRSV)

Comment: The current draft PRSV standard does not account for ULF applications where lower flow rates are needed for specific niche markets. In jurisdictions where the WaterSense markings become promulgated into law, a WaterSense certification covering all PRSV's may inadvertently ban these ULF products.

Rationale: The ULF PRSVs can be defined as having a flow rate of  $\leq 0.8$  gpm at 60 psi with a 4 ounce minimum force requirement for cleaning.

Suggested Change (or Language): We are proposing the addition of an Ultra Low Flow Pre-Rinse Spray Valve to provide manufacturers & consumers with two distinct levels of WaterSense PRSV products

An ULF-PRSV would be defined as a PRSV with a maximum of 0.8 gpm @ 60 psi, with 4 ounce minimum force requirement, which yields minimum of 50% flow rate reduction of the federal 1.6 gpm requirement

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**Commenter:** Miles Green  
**Affiliation:** Integra Marketing  
**Comment Date:** March 28, 2013

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***Email Attachment:***

March 29 2013

From: Miles Green  
Integra Marketing  
15613 Blackburn Ave.  
Norwalk, CA 90650

With regard to your proposed Draft Specification for Commercial Pre-Rinse Spray Valves, our company respectfully disagrees with the performance standard you have set and limited range of choices your recommendation will offer to commercial foodservice operations.

As your own website points out, pre-rinse spray valves can account for nearly one-third of the water used in the typical commercial kitchen, totaling approximately 32 billion gallons of water a year. By eliminating ultra-low flow spray valves (typically classified as less than 0.8 gpm), you are potentially increasing our current water and associated energy consumption by 25 to 50 percent. We regularly sell these ultra-low flow spray valves to commercial kitchens because not every application requires a higher flow/higher spray force. With all due respect, we believe the extensive testing done in our industry far surpasses the limited EPA field study in providing measurable data regarding performance, sanitation, employee safety/satisfaction, and water/energy usage of specific spray valves.

We feel that the proposed "one size fits all" strategy this specification promotes fails to consider the flexibility required in Commercial kitchens. Eliminating the range of choices we currently have in pre-rinse spray valves would have a significant negative impact in numerous areas. In all our applications, we factor in our concern for responsible use of water and energy, public health, employee safety and our own bottom line. Your specification, as it currently stands, threatens each of those aspects and undermines our expertise in determining best practices for our specific PRSV applications.

We respectfully request that your proposed Draft Specification for Commercial Pre-Rinse Spray Valves be revised to include a provision for ultra-low flow spray valves with less than 0.8 gpm flow rate and a 4 oz minimum spray force, which we deem essential to the needs of the commercial foodservice industry.

Sincerely Yours,

Miles N. Green  
Integra Marketing Inc.



**Commenter:** Kelsey Wick  
**Affiliation:** W. West Equipment & Furnishings Co  
**Comment Date:** March 28, 2013

---

***Email Attachment:***

29 March 2013

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Sincerely yours,

Kelsey Wick  
Project Manager  
W West Equipment & Furnishings  
(720) 961-0335 or Kelsey@wwestequipment.com

**Commenter:** Margaret Bach  
**Affiliation:** San Diego Restaurant Supply  
**Comment Date:** March 29, 2013

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***Email Text:***

Please note the attached letter as we are greatly concerned about our numerous customers losing the choice to use these spray valves in their establishments.

Margaret Bach, Purchasing  
San Diego Restaurant Supply  
1202 Market Street  
San Diego, CA 92101  
P(619)239-8107  
F(619)239-1200

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***Email Attachment:***

To whom it may concern:

29 March 2013

With regard to your proposed Draft Specification for Commercial Pre-Rinse Spray Valves, our company respectfully disagrees with the performance standard you have set and the limited range of choices your recommendation will offer to commercial foodservice operations.

As your own website points out, pre-rinse spray valves can account for nearly one-third of the water used in the typical commercial kitchen, totaling approximately 32 billion gallons of water a year. By eliminating ultra-low flow spray valves (typically classified as less than 0.8 gpm), you are potentially increasing our current water and associated energy consumption by 25 to 50 percent. We regularly use these ultra-low flow spray valves in our kitchens because not every application requires a higher flow/higher spray force. With all due respect, we believe the extensive testing done in our industry far surpasses the limited EPA field study in providing measurable data regarding performance, sanitation, employee safety/satisfaction, and water/energy usage of specific spray valves.

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Sincerely yours,

Margaret Bach, Purchasing  
San Diego Restaurant Supply  
1202 Market Street  
San Diego, CA 92101

**Commenter:** Jeff Baldwin  
**Affiliation:** T&S Brass and Bronze Works, Inc.  
**Comment Date:** April 4, 2013

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***Email Text:***

April 4, 2013

Dear EPA WaterSense Program,

T&S Brass and Bronze Works, Inc appreciates your invitation to offer comments and input regarding your proposed Draft Specification for Commercial Pre-Rinse Spray Valves. As the original inventor of the pre-rinse spray unit and a successful commercial plumbing and foodservice product manufacturer for nearly 70 years, T&S Brass feels quite confident that we understand the various PRSV needs of the foodservice industry well. That being the case, we respectfully request that the EPA WaterSense program strongly reconsider the indirect exclusion of ultra low-flow spray valves in the current proposed specification. For example, the T&S ultra low-flow B-0107-C PRSV design has been utilized in this market for more than 25 years and our customers - which include leading commercial foodservice companies located around the world - consider them a valuable and integral tool for their daily rinsing applications. We know through our years of experiences in offering these products that our customers are highly satisfied and have come to depend on both the ultra low-flow and the low-flow pre-rinse spray valves. Not including provisions for the ultra low-flow designs with lower spray forces in the EPA WaterSense specification will severely impede the end-users' ability to choose products that best suit their specific needs and will also have a negative impact on their water and energy conservation efforts.

The WaterSense PRSV draft specification as it currently stands recommends commercial pre-rinse spray valves with a maximum flow rate of 1.28 gpm @ 60 psi, which yields a minimum 20% flow rate reduction of the federal 1.6 gpm requirement, and a 5 ounce minimum force requirement. We respectfully ask that you broaden this recommendation to also include commercial pre-rinse spray valves with a maximum flow of 0.8 gpm @ 60 psi, which yields a minimum 50% flow rate reduction of the federal 1.6 gpm requirement, and a 4 ounce minimum force requirement. Including this additional language in the proposed specification would give consumers the option to choose from two distinct versions of WaterSense PRSV products for their specific rinsing applications.

Based upon the EPA's request in recent conversations, we have asked several of our key customers to share their comments and independent testing data with you regarding the well-proven performance and importance of our ultra low-flow pre-rinse spray valves. We hope that, after reviewing their information and gaining a better understanding of their overall satisfaction level, you will reconsider the proposed WaterSense PRSV specification.

As a member of the WaterSense PRSV task force involved in the development process of this draft proposal, I would like to see this specification embraced and supported by the foodservice industry. But without the inclusion of ultra low-flow spray valves, our company fears that this specification will instead encounter significant resistance. If I can personally be of any assistance in providing any other information relevant to helping the EPA and ERG revisit the Draft Specification for Commercial Pre-Rinse Spray Valves, please let me know at your earliest convenience.

Thanks,

Jeff Baldwin  
Engineering Manager  
T&S Brass and Bronze Works, Inc.  
jbaldwin@tsbrass.com  
(864) 834-6756 direct  
(864) 660-6349 fax



**Commenter:** Dennis Dugan  
**Affiliation:** Unaffiliated  
**Comment Date:** April 4, 2013

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***Email Attachment:***

Commenter name: Dennis Dugan

Commenter Affiliation: Self

Date of Comment Submission: April 4, 2013

Speaking as a private citizen, I offer the following comments re: the draft specification for PRSV's

**Re: Sections**

I. Introduction

The California Urban Water Council estimates there are 175,000 PRSV's in California alone. Population extrapolation yields about 1.5 million valves in use in the U. S. I believe this figure is far more accurate than EPA's estimate of 970,000. EPA seems out of touch with reality to say there are 970,000 food serving establishments, acknowledge that many establishments use more than one PRSV, and then use 970,000 as the number of PRSVs in use in the U.S. 1.5 million valves implies an average of 1.5 nozzles per food serving establishment (using EPA's estimate of 970,000 food serving establishments). Based on experience, 1.5 valves per establishment, on average, seems correct and correlates well to the California Urban Water Council's estimate. Therefore EPA should stop using the 970,000 figure and start using a number near 1.5 million.

II. Current Status of Commercial PRSVs

EPA's purported 5 year useful life is pure fiction. On average, PRSV's last 1 to 1.5 years. Yes, a few last 5 years, but as many also last 3 months. Using 1.5 years of life and 1.5 million valves, the annual sales rate of new PRSV's equals about 1 million, not the EPA's estimate of 200,000. The water, sewage and energy savings numbers listed in this section are also severely underrated. I'll comment more on this later.

III. WaterSense Draft Specification for Commercial PRSVs

A maximum flow rate of 1.28 gpm to earn the WaterSense label is fine and has adequate justification, at 20% less than the EPA 2005 standard of 1.6 gpm.

EPA makes the statement that "Users were generally less satisfied with PRSVs that flowed at less than 1.0 gpm. While true when including the qualifier ..."generally less satisfied..." the implication is false as some valves with flow rates less than 1.0 gpm

earned excellent user satisfaction scores. This illustrates that manufacturers have the capability, if not yet the willingness, to design PRSV's that perform very well with flow rates less than 1 gpm. EPA should acknowledge this manufacturers' ability to market PRSVs with less than 1 gpm and still achieve high user satisfaction scores, and not hide behind false generalizations to support pre-conceived points of view.

EPA makes the statement that "Several users indicated low pressure (i. e. spray force) as a reason for dissatisfaction." When there are 1.5 million valves in use today, "Several users" is not justification to adopt spray force as a performance criteria to earn the WaterSense label.

EPA says..."The (WaterSense) program seeks to help consumers make smart water choices that save money and maintain high environmental standards without compromising performance. [Products and services](#) that have earned the [WaterSense label](#) have been certified to be at least 20 percent more efficient without sacrificing performance."

Let's look at the statement above which says..."without sacrificing performance." Beyond the fact that there are PRSVs with water flows of less than 1 gpm and which earned excellent user satisfaction scores, the marketplace is perfectly capable of distinguishing acceptable performance criteria among different available PRSV models. The U. S. federal government should not be in the business of specifying spray force (5 oz) (or cycles (500,000)) as a criterion for earning the WaterSense label. EPA should use only water flow. EPA seems to justify using spray force criteria based on user-satisfaction as a determinant. While I'm not going to waste time going back through the field test data or committee notes, the truth of the matter is that spray force has only a (by memory) 27% correlation to user satisfaction. And, that 27% wasn't a measured observation but a second derivative calculation, rendering it almost useless for the purpose of establishing a performance criteria. There isn't an organization in the U. S. (apparently other than the WaterSense division of EPA) that would move ahead with a decision based on a 27% positive correlation. As to cycle criteria, there was very minimal discussion and very little consideration given to it as a criteria. Memory suggests it was more of an offhand, or out of context, suggestion by a single manufacturer which EPA then decided to run with so as to make it appear that their standard-developing methodology had far more robustness, and therefore, credibility than it actually has. Memory also suggests there was zero testing done to ascertain how existing nozzles would stand up to this proposed cycle standard. Zero. And, there was zero correlation of cycle performance to user satisfaction. How can EPA suggest using spray force as a criteria when it has a user satisfaction correlation of 27%? How can EPA suggest cycle performance as a criteria when it has no known correlation to user satisfaction? It would be factually and categorically wrong to use either force or cycles as performance standards for the aforementioned reasons. EPA should stick with only flow rate as a criteria; or go back to the drawing board and find other performance criteria with a minimum of over 60% positive correlation to user satisfaction for any criteria so chosen.

#### IV. Potential Savings and Cost Effectiveness

The potential water, sewage and energy savings in the draft spec are grossly under-estimated.

**Water.** The amount of water saved at the restaurant spigot is not the correct way to measure water savings from a lower-flow PRSV. EPA has data (I'm sure) which calculates the amount of total water and energy it takes to produce a gallon at the end-user spigot. This includes losses incurred, and energy used, in collection (reservoirs, streams, rivers, etc.), transportation to a filtering plant, operation of the filtering plant, distribution to, and through, mains and in-house to the final point of use. My memory, from having been President of multiple regulated water and sewage companies, is that these losses could be 2 to 10 times the savings calculated by merely by using the savings from switching from a 1.6 (or 2.0 gpm) nozzle to a 1.28 gpm nozzle to earn the label. For EPA to ignore these huge water losses and the energy required to collect, purify and get water to its point of use (and not just the energy to heat tap water to use temperature, is, simply, stupid. It paints EPA as either disingenuous in its search for setting a water flow standard, or outright incompetent in its approach, processes and procedures.

**Sewage.** More important than water in cost and energy use. Yet, not even mentioned or considered.

**Energy.** EPA only considers the amount of energy used to heat tap water to use-temperature. This is as gross an oversight as those made in the water number above. The energy used in the collection, filtering, distribution, etc, processes for water; and in the collection, and operation of sewage plants far exceeds the energy used in simply heating the water the point of use. Again, maybe 2 to 10 times more. And, again, EPA has the data to fully account for all the energy used in the complete cycle from raw water sitting in a reservoir or a river, to final use in the restaurant, to treatment at the sewage plant, but doesn't use it. Again, stupid isn't too strong a word to characterize EPA's methodology here.

#### V. Other Items for Consideration...WaterSense and ENERGY Star

Energy Star does not support WaterSense's methodology in arriving at the performance criteria recommended, i.e. force and cycles. WaterSense people should be honest and fully disclose the substance of the opinions of Energy Star people (and their opposition) about this WaterSense process, conclusions and recommendations for PRSVs. Not having done so, so far, implies EPA's disingenuousness in the process of establishing criteria for PRSVs earning a WaterSense label.

#### Appendix A. Calculations and Key Assumptions

3 hours a day of use is far more typical than 64 minutes a day for PRSVs. And, again, a 5 year life for PRSVs is nonsense. "Manufacturer input", upon which parts of both these fantasies are based, is not the correct way of establishing the average amount of time each day a PRSV is in use. Ask objective end users and experts in the



field (restaurant operators and restaurant kitchen equipment service companies like EcoLab), not unobjective entities (like PRSV manufacturers) which have a vested interest in their answers. Using 1.6 gpm to calculate savings from a 1.28 gpm standard is wrong. EPA's own field tests yielded an average PRSV water use of a little over 2 gpm per nozzle. Why not use that number? EPA uses numbers and other criteria from their field trials in other areas of this process. Using 2 gpm and 3 hours a day of use yields water consumption of 122,400 gallons per year per nozzle, at 340 days per year. Multiply that by 1.5 million nozzles in service yields 184 billion gallons per year of water use through all PRSVs. That's so far over EPA's 32 billion gpy estimate that it in itself justifies a complete re-think of this whole WaterSense program for PRSVs. Using the same criteria, 2 gpm down to 1.28 gpm, or 36%, to calculate savings, yields a savings of 44,000 gallons per year per nozzle, not the 7,000 gpy EPA uses. Again, many standard deviations away from EPA's 7000 gpy number.

**General Conclusion:** EPA's processes, followed in determining its recommended standards for earning the WaterSense label for PRSVs, are so seriously flawed (indeed, absolutely incorrect in some cases) as to render its conclusions false, and therefore not usable. This is true from its lack of controls and using the scientific method in its field testing, to how it managed the teleconferences, to how it gathered industry input, to its assumptions, to its methodologies, to its calculations, and on and on and on. The conclusions flowing from EPA's processes are wrong and should be abandoned. At this stage, WaterSense should use only a single qualifier for earning its label: 1.28 gpm. Nothing more. After more rigorous and engineering-, scientifically- and correlation-correct-valid testing is completed, more performance criteria can be added at a later date.

**Commenter:** Della Williams  
**Affiliation:** FabWright, Inc.  
**Comment Date:** April 4, 2013

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***Email Attachment:***

**FabWright, Inc.**

13912 Enterprise Drive • Garden Grove, CA 92843  
714-554-5544 • 800-854-6464 • Fax 714-554-5545  
[www.fabwrightinc.com](http://www.fabwrightinc.com)

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March 29, 2013

To Whom It May Concern:

With regard to your proposed Draft Specification for Commercial Pre-Rinse Spray Valves, our company respectfully disagrees with the performance standard you have set and the limited range of choices your recommendation will offer to commercial foodservice operations.

As your own website points out, pre-rinse spray valves can account for nearly one-third of the water used in the typical commercial kitchen, totaling approximately 32 billion gallons of water a year. By eliminating ultra-low flow spray valves (typically classified as less than 0.8 gpm), you are potentially increasing our current water and associated energy consumption by 25 to 50 percent. We regularly use these ultra-low flow spray valves in our kitchens because not every application requires a higher flow/higher spray force. With all due respect, we believe the extensive testing done in our industry far surpasses the limited EPA field study in providing measurable data regarding performance, sanitation, employee safety/satisfaction, and water/energy usage of specific spray valves.

We feel that the proposed “one size fits all” strategy this specification promotes fails to consider the flexibility required in commercial kitchens. Eliminating the range of choices we currently have in pre-rinse spray valves would have a significant negative impact in numerous areas. In all our applications, we factor in our concern for responsible use of water and energy, public health, employee safety and our own bottom line. Your specification, as it currently stands, threatens each of those aspects and undermines our expertise in determining best practices for our specific PRSV applications.

We respectfully request that your proposed Draft Specification for Commercial Pre-Rinse Spray Valves be revised to include a provision for ultra-low flow spray valves with less than 0.8 gpm flow rate and a 4 oz. minimum spray force, which we deem essential to the needs of the commercial foodservice industry.

Sincerely,

Della Williams



Office Manager  
FabWright, Inc.  
714 554 5544

**Commenter:** Kenneth Lawler  
**Affiliation:** E3 Commercial Kitchen Solutions  
**Comment Date:** April 5, 2013

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***Email Text:***

Good Morning Water Sense

Please see the attached letter. Yes it is a letter you will get multiple times in the same format from multiple people but that does not take away from the fact that this is an important issue that I believe Water Sense needs to address. The industry needs and wants effective, low flow pre-rinse valves and there should absolutely be a place for them.

Thank you

--

Ken Lawler | [e3 commercial kitchen solutions](#) | p: 978.801.0350 | m: 978.314.9093 |

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29 March 2013

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Valves be revised to include a provision for ultra-low flow spray valves with less than 0.8 gpm flow rate and a 4 oz. minimum spray force, which we deem essential to the needs of the commercial foodservice industry.

Sincerely yours,

Kenneth Lawler

Partner  
E3 Commercial Kitchen Solutions  
m 978-314-9093

**Commenter:** Michelle Clary  
**Affiliation:** E3 Commercial Kitchen Solutions  
**Comment Date:** April 5, 2013

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***Email Text:***

Please see the attached letter. This is an important issue that I believe Water Sense needs to address ASAP. Our industry not only wants.. but NEEDS effective low flow pre-rinse valves. With you taking these options away you will be increasing the current water and energy consumption. You are taking your minimal field study data and coming to a conclusion with out seeing the real repercussions of your actions.

Thank You

Michelle

**Michelle Clary**

[michelle clary](#) | [e3 commercial kitchen solutions](#) | p: [800.200.4674](#) | direct: [781.257.2871](#)

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***Email Attachment:***

29 March 2013

To Whom It May Concern

With regard to your proposed Draft Specification for Commercial Pre-Rinse Spray Valves, our company respectfully disagrees with the performance standard you have set and the limited range of choices your recommendation will offer to commercial foodservice operations.

As your own website points out, pre-rinse spray valves can account for nearly one-third of the water used in the typical commercial kitchen, totaling approximately 32 billion gallons of water a year. By eliminating ultra-low flow spray valves (typically classified as less than 0.8 gpm), you are potentially increasing our current water and associated energy consumption by 25 to 50 percent. We regularly use these ultra-low flow spray valves in our kitchens because not every application requires a higher flow/higher spray force. With all due respect, we believe the extensive testing done in our industry far surpasses the limited EPA field study in providing measurable data regarding performance, sanitation, employee safety/satisfaction, and water/energy usage of specific spray valves.

We feel that the proposed “one size fits all” strategy this specification promotes fails to consider the flexibility required in commercial kitchens. Eliminating the range of choices we currently have in pre-rinse spray valves would have a significant negative impact in numerous areas. In all our applications, we factor in our concern for responsible use of water and energy, public health, employee safety and our own bottom line. Your specification, as it currently stands, threatens each of those aspects and undermines our expertise in determining best practices for our specific PRSV applications.

We respectfully request that your proposed Draft Specification for Commercial Pre-Rinse Spray Valves be revised to include a provision for ultra-low flow spray valves with less than 0.8 gpm flow rate and a 4 oz. minimum spray force, which we deem essential to the needs of the commercial foodservice industry.

Sincerely yours,

**Michelle L. Clary**

Michelle Clary

Estimator



30 Robert Boyden Road

Suite A1000

Taunton, MA 02780

800-200-4674 x 130

**Commenter:** Jane Roach  
**Affiliation:** E3 Commercial Kitchen Solutions  
**Comment Date:** April 5, 2013

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***Email Text:***

Good Morning Water Sense

Please see the attached letter. Yes it is a letter you will get multiple times in the same format from multiple people, but that does not take away from the fact that this is an important issue that I believe Water Sense needs to address. The industry needs and wants effective, low flow pre-rinse valves and there should absolutely be a place for them.

Thank you!

Jane Roach | [E3 commercial kitchen solutions](#) | p 781.257.2870 | f 508.692.9597  
*Please consider the environment before printing this email.*

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***Email Attachment:***

April 5, 2013

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Sincerely yours,

Jane Roach  
E3 Commercial Kitchen Solutions  
781-257-2870

**Commenter:** Lawrence Cantamessa  
**Affiliation:** Posternak Bauer Aitkenhead Cantamessa  
**Comment Date:** April 5, 2013

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***Email Text:***

5 April 2013

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Sincerely Yours,

Lawrence Cantamessa  
Principle  
Posternak Bauer Aitkenhead Cantamessa  
479 White Plains Rd  
Eastchester, NY 10709  
Cell - 914-953-9469  
LC@PBACREP.COM

**Commenter:** Michael Posternak  
**Affiliation:** Posternak Bauer Aitkenhead Cantamessa  
**Comment Date:** April 5, 2013

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5 April 2013

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Sincerely Yours,

Michael Posternak  
Principle  
Posternak Bauer Aitkenhead Cantamessa  
479 White Plains Rd  
Eastchester, NY 10709  
Cell - 914-414-0884  
[MP@PBACREP.COM](mailto:MP@PBACREP.COM)

**Commenter:** Rob Schmid  
**Affiliation:** The Schmid Wilson Group, Inc.  
**Comment Date:** April 5, 2013

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***Email Attachment:***



March 29, 2013

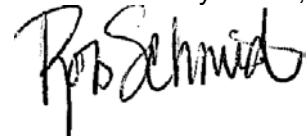
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Sincerely Yours,



Rob Schmid

President

11409 Cronhill Drive ▼ Suite K ▼ Owings Mills, Maryland ▼ 21117  
410-998-9191 ▼ Fax: 410-998-9195

**Commenter:** Joe Burbine  
**Affiliation:** E3 Commercial Kitchen Solutions  
**Comment Date:** April 5, 2013

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***Email Text:***

Greeting Water Sense

Please take a look at the attached letter and consider all the aspects of what low-flow pre-rinse valves do. The majority of the customers we deal with on a daily basis are looking for ways to conserve energy and preserve our environment. With that stated, our manufacturers are conscientiously striving for this and consistently trying to produce products that make sense on all fronts.

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Thanks

**Joe Burbine** | [e3 commercial kitchen solutions](#) |  
**Cell: 617.899.7725** |

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***Email Attachment:***

29 March 2013

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Sincerely yours,

Your Name  
Your Title  
Your Company  
Your contact information

**Commenter:** Ed Wisniewski  
**Affiliation:** Consortium for Energy Efficiency (CEE)  
**Comment Date:** April 10, 2013

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***Email Attachment:***



98 N. Washington St., Suite 101  
Boston, MA 02114  
617.589.3949  
[www.cee1.org](http://www.cee1.org)

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April 10, 2013

Ms. Stephanie Tanner  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Ms. Tanner:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the WaterSense® Draft Specification for Commercial Pre-Rinse Spray Valves, released by the Environmental Protection Agency (EPA) on February 7, 2013.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of EPA's ENERGY STAR® Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states and seven Canadian provinces. In 2011, CEE members directed \$6.1 billion of energy efficiency and demand response program expenditures in the two countries.

These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR and WaterSense brands. CEE consensus comments are offered in the spirit of strengthening these programs.

CEE highly values the role EPA plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

## Draft Specification Offers a Solid Foundation for Energy Efficiency Programs

In 2012, through our annual survey of CEE member commercial kitchens programs, CEE identified 31 members who offered financial incentives to purchase high efficiency



pre-rinse spray valves. These members promote high efficiency pre-rinse spray valves given the hot water and energy savings that result from using less water.

We believe that the Draft Specification for Commercial Pre-Rinse Spray Valves offers a solid foundation for energy efficiency programs. In making this determination, CEE reviewed EPA's supporting statement<sup>1</sup> for this specification, available government field and lab test data, and consulted with a CEE program committee composed of commercial kitchens energy efficiency program managers with experience testing and/or promoting pre-rinse spray valve products in their local markets. We considered the energy savings potential of pre-rinse spray valves that would meet the specification, product performance and customer satisfaction, the expected price differential of qualifying models, the ability to test units in a repeatable and consistent manner and expected product availability. We found that qualifying pre-rinse spray valves would result in significant energy and water savings at low or no extra cost and are expected to perform similar to non-qualifying higher flow units. Testing can be done in a consistent, repeatable manner; and, while it is impossible to calculate the exact number of qualifying models at this time given the new performance metrics cited in the specification, test results for a subset of the criteria indicate that several models made by multiple manufacturers should be able to meet the specification criteria.

At this time we are aware of at least four CEE member organizations that plan to consider adopting the Draft WaterSense specification as the basis for program promotion once it is finalized. Given the positive interest in the specification from a subset of CEE members, CEE plans to raise awareness of this savings opportunity and the final WaterSense specification among additional CEE members. We look forward to finalization of the specification.

CEE would once again like to thank the EPA for the opportunity to comment on the Draft Specification for Commercial Pre-Rinse Spray Valves. Please contact CEE Program Manager Kim Erickson at 617-532-0026 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink that reads "Ed Wisniewski".

Ed Wisniewski  
Executive Director

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<sup>1</sup> This statement includes: a market characterization; discussion of how the water efficiency, force, and product lifetime metrics and specification criteria were developed; the energy savings estimates; and cost-effectiveness. It is available at:  
[http://www.epa.gov/watersense/docs/draft\\_suppstate\\_prsvs\\_020413\\_final\\_508.pdf](http://www.epa.gov/watersense/docs/draft_suppstate_prsvs_020413_final_508.pdf)