Public Comment Submission on WaterSense Documents

Commenter Name: Rachel Margolis

Commenter Affiliation: Appliance Standards Awareness Project

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Topic: Specification for private lavatory faucets (non-metering)

Comment: We support the update to the private lavatory faucet specification for lavatory faucets.

Rationale: The specification for private lavatory faucets was last updated in 2007. Since then, 14 states have adopted standards for faucets that meet or exceed the stringency of the WaterSense v1.0 specification. EPA data shows that high efficiency private lavatory faucets are widely available on the market–almost two-thirds of WaterSense labeled models use 1.2 gallons per minute (gpm) or less [1]. We therefore support EPA's proposal to set the maximum water consumption of private lavatory faucets to 1.2 gpm.

[1] March 28, 2024 stakeholder webinar; slide 16; https://www.epa.gov/system/files/documents/2024-04/faucets_noi_stakeholder_meeting_03-28-24.pdf

Suggested Change (or Language):

Topic: Cold-start faucet criteria

Comment: We support the optional criteria for cold-start faucets.

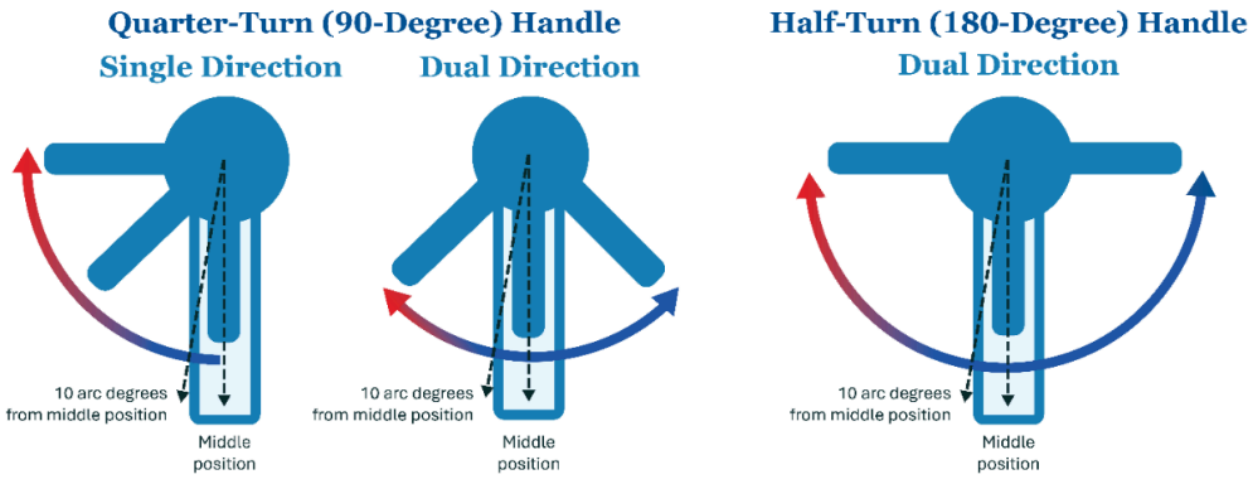
Rationale: The proposed cold-start criteria will identify faucets that not only meet WaterSense, conserving water, but that also incorporate an energy saving design. A faucet with this design will have a default ('middle') position that delivers only cold water. This design requires the user to position the faucet handle away from the middle position before hot water flows. The optional cold-start criteria will therefore help consumers be able to choose faucets that save water while also saving energy. We also support the proposed temperature labeling on the faucet. The proposal, which requires an indicator that the middle position only dispenses cold water, will provide consumers guidance on the temperature of the water, so that they are better equipped to interact with a product with this energy-saving design.

Suggested Change (or Language): In section 4, we recommend specifying 'handle' instead of 'lever' to remain consistent with the language in the test method in Appendix C.

Topic: Cold-start faucet test method

Comment: We think that the test method may not reflect intent.

Rationale: The proposed specification criteria in Section 4.1.2 requires that when the faucet is turned on with the lever “at or within a 10-degree arc of the middle position…it shall only deliver cold water”. However, the the language in Appendix C, Section 2.2 specifies placing the handle ‘within a 10-degree arc’, which may be interpreted as any arc less than or equal to 10-degrees. Therefore, we are concerned that this would allow hot water to start flowing in a position less than 10 degrees.



Suggested Change (or Language):

e) After at least one minute, adjust the handle towards the hot position such that the handle is ~~placed within~~ positioned at a 10-degree arc from ~~of~~ the middle position. See Figure 2. Note: A protractor or other tool for measuring arc degrees shall be used to establish this position in relation to the middle position.

f) Verify that no water flow or leakage is observed from the hot water inlet while the handle is ~~placed within~~ positioned at a 10-degree arc from ~~of~~ the middle position.

Alternatively, multiple test positions can be specified, one “within a 10-degree arc” and one “at a 10-degree arc”.