5i6r1 comments

Submitter Comments

1. The current wording in the note for proposed new paragraph 6.1.2 would require a certification organization (CO) to accept test data from another CO, in lieu of performing the otherwise required test. Requiring acceptance of another CO's certification creates undue liability concerns. If and when there is a failure of a product, the organization that made the certification decision for that product will likely be deemed liable. Without the ability of a CO to maintain control over or assess the quality of the inputs to the certification (in this case, test data), their exposure to legal risk substantially increases.

2. Per ISO/IEC 17007, "Conformity assessment - Guidance for drafting normative documents suitable for use for conformity assessment", product Standards such as NSF/ANSI 5 should focus only on the evaluation criteria or performance characteristics of the product. It should be left up to the certification organization (CO) to decide what methods and means of conformity assessment activity will be utilized, who will carry out the conformity assessment, and under what conditions. The CO requirement for data acceptance is outside of the scope and intent of product standards, and conflicts with the CO's control of their Mark and proprietary information. Just as a standard requirement cannot force manufacturers to purchase components from a specific supplier, COs cannot be required to accept the certifications of components from other COs. A product standard should not contain requirements that are business decisions on how a CO will provide its service(s).

Submitter proposed solution

Propose deletion of the note for 6.1.2.

Submitter Comments 3078

This statement appears unnecessary since a standard does not typically address a manufacturers' claim.

Submitter proposed solution

Remove paragraph 6.1.3.

Submitter Comments 3077

I disagree with the exclusion of heat recovery equipment from the efficiency calculation. Why should the standard prescribe the methods by which a manufacturer can meet the requirement of 75% efficiency?

Submitter proposed solution

Remove the second sentence thus allowing heat recovery equipment supplied as part of the appliance to be used in the efficiency calculation.

Submitter Comments

I am in favor of the proposal for gas water heaters as written.

The issue I have is that the proposed draft eliminates all mention of efficiency requirements for electric water heaters from the standard. The cover memo does mention that immersion type heaters are automatically known to be at least 98% efficient and this is the value that is used. I agree with that but feel it should be addressed in the standard. What if a water heater were not an immersion type?

Based on some of the comments I have seen it would appear that confusion among some exists with regard to heat recovery equipment. Perhaps looking at the definition in 3.97 of NSF/ANSI 170 may help clarify the confusion. Based on this definition, heat from heat recovery equipment comes from other sources. Not from heat produced by the water heater itself. Heat from heat recovery equipment has never been included as part of NSF 5 testing. The heater must meet the requirements without any heat recovery equipment. Any heat then added as a result of heat recovery is an added benefit but can not be relied upon to help meet the requirement since the the input source is uncontrolled.

Submitter proposed solution

Add requirements for electric water heaters.

Submitter Comments 3103

I have spent the last two days without hot water. Even though the test data that came with the heater stated the unit was 90% efficient. Eliminating performance testing and substituting theoredical calculation does nothing to improve the usefulness of the standard.

Submitter proposed solution

Keep the performance testing in.

Submitter Comments 3087

Concur with Joel Hipp's memo. The assumption that values can be caluculated solely, appears questionable. It would be the same as caluclating the gas milage for all 4 cylinder cars the same.

Submitter proposed solution

Retain origional wording.

Submitter Comments

Retention of Thermal Efficiency criteria - items 6.1.2 & 6.1.3 (these should be 6.1.1 & 6.1.2 respectively) appears to be contrary to the original Joint Committee discussion to remove the requirement of thermal efficiency test.

Para 6.1.2 requires minimum efficiency of 75% for gas and oil fired equipment. This implies no efficiency tests (exemption) for other forms of energy source such as solar, electric or steam coil heaters. Also, the statement that 'heat recovery equipment shall not be used to calculate efficiency' can cause problems as some equipment will not function if a pre-heater or exhaust gas recovery unit is blocked. It may not always be possible to test when parts of the unit are blocked and test procedure will be very cumbersome. Also, there is no rationale as to why 'heat recovery' subsystems should not be part of efficiency calculations. Recommendation: Delete item 6.1.2, for item 6.1.3 - delete words "...for heat recovery equipment..."