

January 21 , 2004

Andrew Fanara  
Energy Star Product Development  
US Environmental Protection Agency (EPA)  
1310 L St. NW, MC 6202J  
Washington, DC 20005

RE: RESPONSE TO PUBLIC COMMENTS ON PROPOSED TEST PROCEDURE  
FOR AIR CLEANER ENERGY STAR PROGRAM

Dear Mr. Fanara:

AHAM has recently reviewed two public comment letters submitted to the EPA by stakeholders in response to the EPA proposal for an Air Cleaner Energy Star Program. These two letters, submitted by IQAir Inc./Austin Air Systems Ltd. and Hamilton Beach/Proctor-Silex Inc. (copies attached), are posted on the EPA web site<sup>1</sup> and contain several comments on ANSI/AHAM Standard AC-1, "Method for Measuring Performance of Portable Household Electric Cord-Connected Room Air Cleaners." As the ANSI-accredited standards developing organization (SDO) for this ANSI-approved consensus performance standard, AHAM is herein responding to those comments in an effort to correct inaccuracies suggested by the comments and to provide balanced, fair information on the standard.

Please note that it is not AHAM's intent to comment on these companies' positions regarding the proposed criteria for the EPA Air Cleaner Energy Star program - only to respond to comments related to the ANSI/AHAM AC-1 test method.

#### GENERAL COMMENTS

ANSI/AHAM AC-1-2002 is an approved American National Standard and the only known consensus performance standard for room air cleaners. This standard is repeatable and reproducible, and can be performed on any air cleaner that removes particulate matter, regardless of the technology used.

<sup>1</sup> [http://www.energystar.gov/index.cfm?c=new\\_specs.air\\_cleaners](http://www.energystar.gov/index.cfm?c=new_specs.air_cleaners)

The document was last reaffirmed by ANSI in 2002. Part of this process, and every ANSI reaffirmation process, includes a public review, during which time the proposed or revised standard is sent out to a balanced group of stakeholders and surveyed for comment. AHAM urges all interested parties to participate in the standards development process so that their concerns can be considered.

### SPECIFIC COMMENTS

#### Part I: Hamilton Beach/Proctor Silex Letter

*- Claim is made that “CADR Means Smoke”*

This is not correct. The three types of particulate matter (smoke, dust and pollen) used in the ANSI/AHAM procedure were selected to represent the typical sizes of particles found in the home. Cigarette smoke is an effective proxy used to simulate particles ranging in sizes from 0.09 µm to 1.0 µm in diameter. Dust and pollen are used to simulate larger sized particles, and there is a separate CADR rating for each particulate.

#### Part II: IQAir North America, Inc./Austin Air Systems Ltd. Letter

*- Claim is made that AHAM misleads the consumer to think that AHAM certified air cleaners are effective against gaseous pollutants and odors.”*

We do not agree with this characterization. The scope of ANSI/AHAM AC-1 states specifically: “This standard method measures the relative reduction by the air cleaner of particulate matter suspended in the air in a specified test chamber.” It is very clear that gases and odor are not covered in this standard. Air cleaners that only remove gases or odor do not fall within the scope of the AHAM standard and AHAM makes no claim to the contrary. In addition, the AHAM Certification Seal that is placed on the packaging of every certified unit refers to the performance based on reduction of tobacco smoke, dust and pollen. The consumer is provided with clear information on what pollutants were used for the CADR rating.

*- Claim is made that “AHAM does not test average air cleaning performance, but only initial air cleaning performance”*

This is a non-issue. To our knowledge, the majority of performance standards in existence today measure only initial performance. This includes the current EPA Energy Star test procedures for many products.

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- *Claim is made that AHAM AC-1-2002 is "outdated"*

This is not correct. This performance standard was just reaffirmed by ANSI in 2002. It is current and applicable to all known technologies of air cleaners that remove particulate matter within the standard's scope.

- *Claim is made that "AHAM even promotes ozonation"*

AHAM does not promote any specific brand of air cleaner or any specific technology for air cleaners. Furthermore, within the standard itself, AHAM properly references the need for compliance with UL safety standards, UL 507, "Standard for Fans" and UL 867, "Standard for Electrostatic Air Cleaners." UL 867 includes a test for measuring the production of ozone.

- *Claim is made that "there is only one test laboratory in the world that currently conducts this test and that EPA is endorsing a quasi-monopoly"*

AHAM is aware of other manufacturers and private sector organizations that have the appropriate ANSI/AHAM AC-1 specified chamber. There is no requirement that manufacturers must only use the AHAM approved third party laboratory to obtain CADR ratings. Manufacturers and other interested parties may build their own facilities and several have already done so.

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**We ask that this letter, as well as AHAM's previous comments on the Air Cleaner Energy Star Proposal (copy attached) be posted to the same EPA web site to ensure that AHAM's response is available publicly to present a balanced view on these issues.**

**Furthermore, we ask that EPA consider including a clarifying statement on the web site to explain the EPA policy for posting public comments. The lack of any such statement gives the public the incorrect impression that only two public comment letters were submitted on the EPA Air Cleaner Energy Star Proposal.**

Thank you for your consideration.

Sincerely,



Ramona J. Saar  
AHAM  
Director, Standards & Certification Program

Cc: Charles A. Samuels, AHAM Legal Counsel

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