

# ENERGY STAR® Draft 1 Version 3.0 Room Air Cleaners Specification

## Comment Response Matrix

Topics	Stakeholder Comment	EPA Response
<b>Scope</b>	<p>One stakeholder recommends relying solely on PM<sub>2.5</sub> CADR instead of smoke CADR and dust CADR to define “included products” within the scope and suggests using the same language as the DOE. Furthermore, this stakeholder highlights that the definition of “included products” is not consistent with the one found in the EPA’s Data Analysis file and suggests maintaining consistency by using the verbatim definition found in AHAM AC-7 and/or Appendix FF.</p> <p>Two stakeholders recommend that the EPA should align the product scope with the current DOE standard for room air cleaners, suggesting that lowering the limit to 10 CADR cfm would ensure all federally compliant models have an equal opportunity to qualify. One stakeholder also advises against limiting equipment eligibility based on pollen CADR.</p> <p>The stakeholder also stated it is premature to include combination products in the ENERGY STAR specification.</p>	<p>While the DOE defines the test procedure scope in terms of smoke CADR and dust CADR and the energy conservation standards are based on PM<sub>2.5</sub> CADR, the DOE and the EPA agree that it would be more appropriate to define the scope of this specification in terms of PM<sub>2.5</sub> CADR to avoid inadvertently excluding products that may have a smoke or dust CADR below 30 cfm, while still having a PM<sub>2.5</sub> CADR at or above 30 cfm. Accordingly, the DOE and the EPA propose to update the scope in terms of PM<sub>2.5</sub> CADR.</p> <p>The EPA considered products that have a CADR under 30 cfm and is concerned that these products serve niche applications for small spaces. For this reason, the EPA has decided to continue excluding them from the scope.</p> <p>The EPA will continue to exclude combination products in this version of the specification but may revisit the topic in a future revision.</p>
<b>Efficiency Criteria</b>	<p>One stakeholder supports the minimum efficiency requirements and the adoption of the integrated energy factor (IEF) and PM<sub>2.5</sub> CADR metrics, and agrees with the proposed IEF levels.</p> <p>Two stakeholders proposed that the EPA adopt a single equation-based standard since larger CADR products can achieve higher energy efficiency levels. This approach would remove any product class-based incentive for product development and support a fair alignment of efficiency, size, and clean air delivery rate.</p>	<p>The EPA is maintaining the same product classes and levels as proposed.</p> <p>The EPA is interested in an equation-based approach and will review the opportunity for the next specification revision.</p>

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<b>Additional Requirements</b>	<p>Two stakeholders request that the EPA include a mandatory reporting requirement on whether a model has an automatic mode. They also recommend refining and clarifying the definition of “Auto-Cleaning Mode,” proposing a slightly modified version of the AHAM AC-7 definition.</p> <p>Two stakeholders requested that the EPA make pollen CADR reporting mandatory only for models with 25 pollen CADR cfm and above.</p> <p>One stakeholder proposed that the EPA remove the reporting requirement for pollen, which would align with DOE’s Direct Final Rule.</p> <p>One stakeholder suggested including room size reporting, to align with the AHAM Verified Program.</p>	<p>The EPA will allow partners to report an auto cleaning mode when certifying.</p> <p>The EPA is maintaining required pollen reporting for all models, as it is useful for consumers primarily concerned with pollen.</p> <p>The EPA currently calculates and displays effective room size on the ENERGY STAR Qualified Products List for room air cleaners. The calculation is 1.55 multiplied by the smoke CADR, which is the same formula used by AHAM. The EPA plans to continue this calculation and display effective room size rather than require effective room size reporting, which reduces burden for partners.</p>
<b>Test Procedure</b>	<p>One stakeholder recommends more alignment with the DOE’s test procedure and additional reporting requirements. This stakeholder states that updates to the test procedure for air cleaners will be addressing issues like automatic mode, and will be changing the sampling procedure to require testing of at least two units for certification. They also suggest that the EPA either note that the DOE test procedure incorporates AC-7 by reference or directly reference AC-7. Additionally, this stakeholder points out that the EPA’s footnotes should refer to AC-7 instead of Appendix FF and that references to PM<sub>2.5</sub> CADR should be clarified in the context of AC-7.</p> <p>One stakeholder had concerns regarding retesting and relabeling products for Version 3.0 as it would incur significant costs.</p>	<p>The EPA has reviewed the recommendations related to better alignment with the DOE’s test procedure and reporting requirements and made the appropriate edits.</p> <p>With respect to recertification, brand owners of currently certified ENERGY STAR models will likely have all the necessary test data already. In that case, the brand owner would not need to retest. Instead, they will need to work with their certification bodies to update the models’ certifications.</p>
<b>Other</b>	<p>One stakeholder points out several corrections including that the definition for CADR includes a note that is repetitive. Additionally, they request context to explain Clause 3 at Line 130 in the ENERGY STAR Draft 1 specification, as the current wording is unclear.</p>	<p>The EPA has reviewed the recommendations and made edits to provide clarity.</p>