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September 26, 2019

Via E-Mail

Katharine Kaplan  
U.S. Environmental Protection Agency

roomaircleaners@energystar.gov

Re: ENERGY STAR Final Draft Version 2.0 Room Air Cleaners Eligibility Criteria

Dear Ms. Kaplan:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Final Draft Version 2.0 Room Air Cleaners eligibility criteria.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement, as long as products maintain their performance for the consumer. We would like to suggest a clarification in the definition of combination product.

EPA revised the definition of combination product to indicate that this is a product that provides another principal function, other than actively removing particulate matter from the air. This change is intended to prevent confusion because the prior version of the definition used the term primary function which has a specific definition in the specification. The definition of combination product references examples of non-principal functions such as a humidifier or dehumidifier.

AHAM recognizes EPA's desire to be consistent with AHAM AC-1 in terms of defining principal function as reducing particulate matter. AHAM's concern is that the list of additional functions—i.e., humidifiers or dehumidifiers—is not an exclusive list. Without further clarification, there is a possibility that there could be an interpretation that a device incorporating other treatment technologies such as activated carbon, or UV, for VOC reduction, or microbial reduction, could be considered as an additional principal function. The result would be that such a product would be excluded from the program.

It is not our understanding that this is EPA's intent. Thus, we suggest the following change to be consistent with EPA's intent:

Combination Product: An air cleaner that provides an additional principal function, ~~other than actively removing particulate matter from the air,~~ within the same housing, such as a humidifier or dehumidifier.

We believe this simple clarification will reduce the possibility for misinterpretation and keep alternate filtration-specific technologies from being misidentified or categorized as a combination product.

I would be happy to discuss the specification further should the need arise.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Cleary".

Jennifer Cleary  
Vice President, Regulatory Affairs