

15 September 2003

Mr. Andrew Fanara
U.S. Environmental Protection Agency
Office of Energy Star Programs
1200 Pennsylvania Ave. NW
MC 6202J
Washington, DC 20460

Subject: EPA Proposal on Air Cleaners

Dear Mr. Fanara:

The Association of Home Appliance Manufacturers is the trade association representing the major producers of Portable Room Air Cleaners for the U.S. market.

The manufacturers of room air cleaners have reviewed the proposed test procedure. Additional time is needed for the manufacturers to assess the test procedure and to assess the proposed standard level. The manufacturers do not believe that sufficient time would be allowed for partner companies to implement the program by January 1, 2004. AHAM is requesting that EPA consider an extension of the effective date. This will allow manufacturers sufficient time to affect the necessary packaging changes for Energy Star qualifying units after the program has been finalized.

We are in receipt of the draft proposal for an Energy Star program for air cleaners and we have the following comments:

1. AHAM will not comment on the minimum energy efficiency level that is used by EPA. The individual air cleaner manufacturers will comment on this to EPA.
2. On Page 1, EPA has noted that it is asking partners to provide, "on an annual basis, unit shipment data or other market indicators..." AHAM would like to note that the use of AHAM shipment data reports is confidential and proprietary. These reports should not be shared outside of member companies and should not be used by EPA, if they should be forwarded by mistake.
3. Throughout the test procedure, EPA refers to the measurement of performance in Clean Air Delivery Rate (CADR) as being one of the criteria on which participation is based. EPA should clarify that it is not referring to AHAM Air Cleaner Certification but rather on testing to the ANSI/AHAM AC-1-2002 standard.

4. Definitions. AHAM believes that EPA should removed reference to the term “cord connected” air cleaners. This program should be available for all AC-mains connected types of portable electric room air cleaners, not just cord connected units.
5. Definitions. On Page 4, the definitions of different types of air cleaners are not in alignment with ANSI/AHAM AC-1 2002. In order to avoid confusion, we suggest that EPA use similar definitions as are contained in the above American National Standard.
6. Definitions. We question whether it is necessary to include definitions of High Efficiency Particle Air (HEPA) or Ultra Low Penetration Air (ULPA) Air Cleaners. In addition, we believe EPA should explain why it has chosen to make reference to different air cleaning technologies (i.e. ionizers, electrostatic precipitators, mechanical air cleaners). In addition, no attempt is made to distinguish between a HEPA air filter and a HEPA air cleaner. All of the above are types of air cleaners and the performance testing applies equally to all types of air cleaners, regardless of technology, filter type, etc. As this program is primarily used by consumers to select an air cleaner, we are not certain that it is necessary to differentiate between different types.
7. Definitions. On Page 4, under Section 1, B “Airflow.” We do not understand the use of the use of the term or measurement of “cubic feet per minute (CFM).” The use of CFM is not related directly to CADR and could serve to confuse participants. The actual volume of air flow by an air cleaner is not directly relevant to the performance of the air cleaner appliance. The measurement that is used is the CADR.
8. Page 4, Section 1, ii. Ionizer. We suggest the last sentence be changed to avoid a value judgment. Ionizing systems are designed to supplement the performance of precipitators or mechanical air cleaners.”
9. Page 6. Stand-by Power. AHAM suggests that EPA create a special class of air cleaners that have a sensor or programmable timer functions to operate the unit at prescribed pollutant levels or time periods. While these units may consume additional stand-by power, they will use less energy overall and should not be held to the same energy level as other air cleaners. EPA may wish to gather information from the manufacturers of these sensor or programmable timer units to ascertain their actual energy usage.
10. Section 4, Test Procedure. Relative Humidity. RH should be expressed as a percentage, 40% RH. We suggest this be expressed as follows: “Chamber ambient relative humidity (RH) is to be 40 +/- 5%.” See ANSI/AHAM AC-1-2002, Section 4.2.
11. Page 7, Section 4. Unit operation period. The ANSI/AHAM AC-1-2002 standard, Section 5.1.6 calls for measuring particle concentrations at one-minute intervals for 15 minutes, whereas the EPA proposal calls for 20 minute operation. For some air cleaners, a minimum concentration of particles can be achieved in much less than 20 minutes and AHAM has found that it is possible to achieve valid results by using the decay curves from 15 minutes instead of using 20 minute minimum operation time. We would suggest that the procedure be the same as ANSI/AHAM AC-1-2002 and read, “Acquire particle concentration data and watt readings at one-minute intervals for 15 minute (minimum) beginning at the two-minute point.” A minimum of 10 data points should be used.

12. Section 5, Effective Date. As we stated earlier, AHAM believes that the effective date should be chosen to allow the manufacturers sufficient time to make packaging changes and align with their responsibilities under the program. Perhaps after the test procedure is finalized, manufacturers could be surveyed to see when they believe the program should be made effective.
13. Number of Test Units. EPA may wish to state the number of units to be tested.

We thank you for the ability to comment on the proposed test procedure. We ask that you maintain contact with AHAM to know of the changes made and implementation plans. We would appreciate your response as soon as possible on the request to extend the comment date.

Sincerely,

Wayne Morris
Vice President

