

Appliance Standards Awareness Project  
American Council for an Energy-Efficient Economy

October 10, 2024

Steve Leybourn  
ENERGY STAR Appliance Program Manager  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**RE: ENERGY STAR® Room Air Cleaners Version 3.0 Draft 1 Specification**

Dear Mr. Leybourn,

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on the Room Air Cleaners (RACL) Version 3.0 Draft 1 Specification released on September 11, 2024. We appreciate the opportunity to comment.

**We support the minimum efficiency requirements in the draft specification.** In 2023, there were more than 7 million shipments of RACLs that met the ENERGY STAR v2.0 specification, representing almost 90% of the market.<sup>1</sup> It is therefore important for EPA to update the specification so that it continues to help consumers to identify models that will save energy and reduce electricity bills.

We agree that it makes sense to adopt the integrated energy factor (IEF) metric, PM<sub>2.5</sub> clean air delivery rate per watt (CADR/W), which is used by the Department of Energy. We also support the proposed IEF levels of 4.4, 5.4, and 5.6, for small ( $30 \leq \text{PM}_{2.5} \text{ CADR} < 100$ ), medium ( $100 \leq \text{PM}_{2.5} \text{ CADR} < 150$ ), and large ( $150 \leq \text{PM}_{2.5} \text{ CADR}$ ) RACLs, respectively. These levels would reduce the annual energy cost to operate a RACL by about 60% relative to the current DOE standards.<sup>2</sup> Furthermore, EPA's data shows that there is a wide range of models on the market that meet these levels across the range of PM<sub>2.5</sub> CADR values.<sup>3</sup>

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1

[https://www.energystar.gov/sites/default/files/2024-09/2023%20Unit%20Shipment%20Data%20Summary%20Report\\_508.pdf](https://www.energystar.gov/sites/default/files/2024-09/2023%20Unit%20Shipment%20Data%20Summary%20Report_508.pdf). p. 6.

2

<https://www.energystar.gov/sites/default/files/2024-09/ENERGY%20STAR%20Draft%201%20Version%203.0%20Room%20Air%20Cleaners%20Data%20and%20Analysis.xlsx>. "Incremental Cost and Payback" sheet.

3

<https://www.energystar.gov/sites/default/files/2024-10/ENERGY%20STAR%20Version%203%20Room%20Air%20Cleaners%20Draft%201%20Webinar.pdf>. p. 14.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Rachel Margolis". The signature is written in a cursive style with a large, looped "R" and "M".

Rachel Margolis  
Senior Technical Advocacy Associate  
Appliance Standards Awareness Project

A handwritten signature in black ink that reads "Matt Malinowski". The signature is written in a cursive style with a large, looped "M" and "M".

Matt Malinowski  
Director, Buildings Program  
American Council for an Energy-Efficient  
Economy