

DOCKETED

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3M Comments

Additional submitted attachment is included below.

September 12, 2022

Mr. Alejandro Galdamez
Efficiency Division / Appliances Office
California Energy Commission
715 P Street
Sacramento, CA 95814

Docket Number: 20-AAER-02
Project Title: Air Filters

Dear Mr. Galdamez,

This letter is 3M's response to the California Energy Commission (CEC) Public 15-day comment period dated 8/29/2022 for proposed action on filter labeling requirements.

This latest revision of the for the filter labeling requirements has a new labeling requirement. Section 1607 under item 11 *"In addition, each unit of air filters manufactured on or after January 1, 2026, shall be marked, permanently and legibly, on an accessible and conspicuous place on the edge of the filter frame in font size 12 or larger characters, with the calculated airflow rate value at an Initial Resistance of 0.1 inches water column (cubic feet per minute), and with either the filter's particle size efficiency in the 0.3 to 1.0 micrometer range or the filter's MERV rating."* The previous versions had the filter MERV and 0.3-1.0 PSE information already on the frame in addition to the filter pressure resistance at multiple flow rates. The airflow marking at 0.1 Inch Water Column was only required for the filter registration in earlier versions including the original in 2016. This is a significant change to the labeling requirement as there is now a label required to be visible on the packaging and a different label on the frame. Previous versions had the filtration performance (MERV and % PSE) as well as the airflow CFM and Initial Resistance printed on the frame and viewable through the packaging. This new proposal impacts a second raw material for the production of furnace filters that needs to be unique for each filter size and performance level and adds further complexity to manufacturing. If Table Z-2 is printed on the frame and legible through the packaging, this alone should provide the necessary product information without requiring table Z-3 to be printed on the frame. If Table Z-1 or Z-2 is printed permanently and conspicuously on the frame and visible through packaging, **table Z-3 should not be required.**

The "Airflow" from Table Z-3 should not be needed as the pressure drop is given for multiple face velocities in tables Z1 or Z2. Both tables have the data that is used to determine the airflow value and provide more data to the consumer than just an airflow value at one resistance level. If the air flow data is needed at 0.1 inches of water, it should be added to table Z1 and Z2 instead of being on a separate table. **Please do not have two different tables be required** if table Z1 or Z2 are printed on the frame

If table Z-3 will be required, it should either require MERV or 0.3-1.0 PSE value. Allowing the manufacturer to pick and choose which information to print adds confusion to the market.

There was no response for the specific comment from 3M dated 5/5/22 with regards to the Dust Holding Capacity. These comments are repeated below in italics.

“The Proposed Regulatory Language, “Dust Holding Capacity at the maximum rated airflow rate as published by the manufacturer (grams)” is written. Dust holding is not measured at the maximum airflow rate. Dust holding is a measure of the grams of dust held in the filter within the specified testing conditions listed in the preceding data that the manufacturer has listed. It is the dust held in the filter as the filter was loaded from the “initial resistance” to the “final resistance” at the “Face velocity for the test”. The Dust Hold Capacity should be used from the ASHRAE 52.2 2017 standard. Recommend changing the wording to:

Dust Holding Capacity per the testing conditions previously specified by the manufacturer (grams).

“Dust holding capacity at maximum rated airflow” is terminology that is inconsistent with ASHRAE 52.2, as previously highlighted in the comments. Airflow is measured in CFM, while the Dust Holding capacity is the grams of dust captured by the filter at a specific airflow (CFM) between the initial and ending pressure resistance. The face velocity is specified by the ASHRAE test method and may not match the manufacturer maximum rated airflow.

Timing Impact

An effective date of April 1, 2023, for table 1 or 2 to be on the retail package does not allow adequate time for manufacturers to comply with the regulations that are still being finalized. Until the regulation is finalized manufacturers cannot complete graphics changes on filter packaging components. The filter industry has many different filter sizes and filtration levels. This regulation will require unique components to be produced for each filter performance level and size, preventing manufacturers from being able to share components between filter performance levels. Manufacturers must currently maintain inventory of these components due to supply chain lead times. A short implementation time, likely could result in significant scrap of obsolete items and possibly an inability to produce some products for California. This current draft now requires two printed tables and moves the table Z1 or Z2 from being required on the frame to somewhere on the printed package by April 1 2023. The printed package could be the filter frame or bag, but nonetheless still has a similar impact on a manufacturers ability to comply given the short timeframe currently allowed. This is a large change to the industry and thus would still **request an implementation date for Table Z1 or Z2 to be one year from when the final rule is published and Table Z3 not be required if Table 1 or 2 is printed on the frame as previously suggested.**

Sincerely,



Bryan Gerhardt

3M Center, Building 251-1E-19 | St. Paul, MN 55144-1000

Office: 651 736 6893 |

bgerhardt@mmm.com | www.3M.com